

TSD File Inventory Index

Date: June 7, 2007

Initial: CMK/enead

Facility Name				<u>Solco, Inc. (On Field Site)</u>			
Facility Identification Number				<u>MID 000723728</u>			
A.1 General Correspondence		Y		B.2 Permit Docket (B.1.2)			
A.2 Part A / Interim Status		Y		1 Correspondence			
1 Correspondence		Y		2 All Other Permitting Documents (Not Part of the ARA)			
2 Notification and Acknowledgment		Y		C.1 Compliance - (Inspection Reports)		Y	
3 Part A Application and Amendments		Y		C.2 Compliance/Enforcement		Y	
4 Financial Insurance (Sudden, Non Sudden)		Y		1 Land Disposal Restriction Notifications		Y	
5 Change Under Interim Status Requests		Y		2 Import/Export Notifications			
6 Annual and Biennial Reports		Y		C.3 FOIA Exemptions - Non-Releasable Documents			
A.3 Groundwater Monitoring		Y		D.1 Corrective Action/Facility Assessment		Y	
1 Correspondence		Y		1 RFA Correspondence			
2 Reports		Y		2 Background Reports, Supporting Docs and Studies			
A.4 Closure/Post Closure		Y		3 State Prelim. Investigation Memos			
1 Correspondence		Y		4 RFA Reports		Y	
2 Closure/Post Closure Plans, Certificates, etc		Y		D. 2 Corrective Action/Facility Investigation			
A.5 Ambient Air Monitoring				1 RFI Correspondence			
1 Correspondence				2 RFI Workplan			
2 Reports				3 RFI Program Reports and Oversight			
B.1 Administrative Record				4 RFI Draft /Final Report			

Total -1

5 RFI QAPP		7 Lab data, Soil Sampling/Groundwater	
6 RFI QAPP Correspondence		8 Progress Reports	
7 Lab Data, Soil-Sampling/Groundwater		D.5 Corrective Action/Enforcement	
8 RFI Progress Reports		1 Administrative Record 3008(h) Order	
9 Interim Measures Correspondence		.2 Other Non-AR Documents	
10 Interim Measures Workplan and Reports		D.6 Environmental Indicator Determinations	
D.3 Corrective Action/Remediation Study		.1 Forms/Checklists	
.1 CMS Correspondence		E. Boilers and Industrial Furnaces (BIF)	
.2 Interim Measures		.1 Correspondence	
.3 CMS Workplan		.2 Reports	
.4 CMS Draft/Final Report		F Imagery/Special Studies (Videos, photos, disks, maps, blueprints, drawings, and other special materials.)	
.5 Stabilization		G.1 Risk Assessment	
.6 CMS Progress Reports		.1 Human/Ecological Assessment	
.7 Lab Data, Soil-Sampling/Groundwater		.2 Compliance and Enforcement	
D.4 Corrective Action Remediation Implementation		.3 Enforcement Confidential	
.1 CMI Correspondence		.4 Ecological - Administrative Record	
.2 CMI Workplan		.5 Permitting	
.3 CMI Program Reports and Oversight		.6 Corrective Action Remediation Study	
.4 CMI Draft/Final Reports		.7 Corrective Action/Remediation Implementation	
.5 CMI QAPP		.8 Endangered Species Act	
.6 CMI Correspondence		.9 Environmental Justice	

Note Transmittal Letter to Be Included with Reports.

Comments

Documents do not justify individual federal schedule

DEPARTMENT OR ESTABLISHMENT, BUREAU OR OFFICE

U.S. Environmental Protection Agency, Waste Management Branch

DATE

12/13/83

The publisher of the publication named below is authorized to put the enclosed advertisement according to the schedule below, provided the rates are not in excess of the commercial rates

charged to private individuals with the usual discounts. It is to be set solid, without paragraphing, and without any display in the heading unless otherwise expressly authorized in the specifications.

NAME OF THE PUBLICATION ADVERTISED IN

Monroe News

SUBJECT OF ADVERTISEMENT

Public Notice

EDITION OF PAPER ADVERTISEMENT APPEARED

Friday, December 30, 1983

NUMBER OF TIMES ADVERTISEMENT APPEARED

One Time Only

DATE(S) ADVERTISEMENT APPEARED

Friday, December 30, 1983

SPECIFICATIONS FOR ADVERTISEMENT

Place in legal notice/classified section

COPY FOR ADVERTISEMENT

See attached

AUTHORITY TO ADVERTISE		INSTRUMENT OF ASSIGNMENT	
NUMBER	50127NASA	NUMBER	
DATE	December 15, 1983	DATE	
SIGNATURE OF AUTHORIZING OFFICIAL	<i>Royl E. Jacobson</i>	TITLE	

INSTRUCTIONS TO PUBLISHERS

Extreme care should be exercised to insure that the specifications for advertising to be set other than solid be definite, clear, and specific since no allowance will be made for paragraphing or for display or leaded or prominent headings, unless specifically ordered, or for additional space required by the use of type other than that specified. Specifications for advertising other than solid and the advertisement copy submitted to the publisher will be attached to the voucher. The following is a sample of solid line advertisement set up in accordance with the usual Government requirements.

DEPARTMENT OF HIGHWAYS & TRAFFIC.
D.C. Bids are requested for first spring 1986 cement concrete repair contract, including incidental work, Washington, D.C., Invitation No. C-8578-H, consisting of 11,000 sq. yds. PCC Class BB sidewalk repair and 2,000 cu. yds. PCC Class A pavement, alley, & driveway repair, both cut repairs only. Bidding material available from the Procurement Officer, D.C. Sealed bids to be opened in the Procurement Office at 3:00 p.m., November 15, 1985.

Your bill for this advertising order should be submitted on the "Public Voucher for Advertising" form, which is printed on the reverse of this form, immediately after the last publication of the advertisement. If copies of the printed advertisement are not available, complete the affidavit provided on the voucher. Submit the voucher and a copy of the printed advertisement to ▶

U.S. Environmental Protection Agency
Financial Operations Section
230 South Dearborn Street
Chicago, IL 60604
IMPORTANT

Charges for advertising when a cut, matrix, stereotype or electrotype is furnished will be based on actual space used and no allowance will be made for shrinkage.

In no case shall the advertisement extend beyond the date and edition stated in this order.

PUBLIC VOUCHER FOR ADVERTISING

DEPARTMENT OR ESTABLISHMENT, BUREAU OR OFFICE
U.S. Environmental Protection Agency, Waste Management Branch

PLACE VOUCHER PREPARED
Chicago, Illinois

DATE PREPARED
12/13/83

NAME OF PUBLICATION
Monroe News

For Agency Use Only

VOUCHER NUMBER

SCHEDULE NUMBER

PAID BY

NAME OF PUBLISHER OR REPRESENTATIVE
Steve Gray

ADDRESS (Street, room number, city, State, and ZIP code)

P.O. Box 666
Monroe, MI 48161

Attn: Janet Brant
(313) 242-1100

CHARGES

TYPEFACE	(size of type)	POINT PER	(inch, square, word, or folio)
	NUMBER OR LINES (Indicate counted or space)	COST PER LINE	TOTAL COST
Line Rates	FIRST INSERTION	\$	\$
	ADDITIONAL INSERTIONS GIVE NUMBER ▶		
	TOTAL		\$
	NUMBER OF UNITS (Indicate inch, square, word, folio)	COST PER UNIT	TOTAL COST
Other Rates	FIRST INSERTION	\$	\$
	ADDITIONAL INSERTIONS GIVE NUMBER ▶		
	TOTAL		\$
Attach one copy of advertisement (including upper and lower rules) to each copy of voucher here. If copy is not available sign the following affidavit.		TOTAL LINE RATES AND OTHER RATES	
		LESS DISCOUNT AT %	
		BALANCE DUE	\$
		VERIFIED (Initials)	

AFFIDAVIT

This represents a true billing for the attached advertising order, with specifications and copy, which has been completed.

SIGNATURE OF PUBLISHER OR REPRESENTATIVE

TITLE

DATE

FOR AGENCY USE ONLY

ADVERTISEMENT PUBLISHED IN	DATE PUBLISHED
I certify that the advertisement described above appeared in the named publication and that this account is correct and eligible for payment.	
SIGNATURE AND TITLE OF CERTIFYING OFFICER	DATE
SIGNATURE AND TITLE OF AUTHORIZING OFFICER	DATE
ACCOUNTING CLASSIFICATION <p>QTNO 33 6840200 4A4E 05\$002 2540 Estimate 32.50 12/17/83</p>	PAID BY CHECK NUMBER

If the ability to certify and authority to approve are combined in one person enter "N/A" (not applicable) here.

PUBLIC NOTICE

The U.S. Environmental Protection Agency (U.S. EPA) has received a plan from Salco Industrial Services (Salco) for closure of its hazardous waste facility located at 704 Conant Street in Monroe, Michigan. The plan, submitted November 18, 1983, proposes off-site disposal of sludge and if necessary, off-site disposal of contaminated soils.

The Salco closure plan was submitted to comply with regulations promulgated under the Resource Conservation and Recovery Act. This plan describes the procedures to be implemented in order to secure this site under Federal and State regulations. U.S. EPA will evaluate the plan based on the criteria and Federal closure requirements codified at 40 CFR Part 265, Subpart G.

The plan and related background materials are available to the public at U.S. EPA, Waste Management Branch, 13th Floor, Chicago, Illinois, (312) 886-3713, from 8:30 a.m. to 4:30 p.m., Monday through Friday. These materials may also be reviewed during business hours at the Salco facility located at the above-mentioned address.

Public comments concerning this closure plan are requested by U.S. EPA and will be accepted through January 30, 1984. Please send comments to:

U.S. Environmental Protection Agency
Region V
RCRA Activities 5HW-13
230 South Dearborn Street
Chicago, Illinois 60604

Attention: Sharon Kiddon

A.2 Interim Status



UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY
REGION V

111 West Jackson Blvd.
CHICAGO, ILLINOIS 60604

REPLY TO ATTENTION OF:
RCRA ACTIVITIES

JUN 02 1982

Frank Fulner, Mgr. Vice Pres.
Cousins Industrial Services
Post Office Box 2881
Kenwood Station
Toledo, Ohio 43606

RE: Interim Status Acknowledgement
FACILITY NAME: Cousins Industrial Services

USEPA ID No. MID000722728

Dear Mr. Fulner:

This is to acknowledge that the U.S. Environmental Protection Agency (USEPA) has completed processing your Part A Hazardous Waste Permit Application. It is the opinion of this office that the information submitted is complete and that you, as an owner or operator of a hazardous waste management facility, have met the requirements of Section 3005(e) of the Resource Conservation and Recovery Act (RCRA) for Interim Status. However, should USEPA obtain information which indicates that your application was incomplete or inaccurate, you may be requested to provide further documentation of your claim for Interim Status. Our opinion will be reevaluated on the basis of this information.

As an owner or operator of a hazardous waste management facility, you are required to comply with the interim status standards as prescribed in 40 CFR Parts 122 and 265, or with State rules and regulations in those States which have been authorized under Section 3006 of RCRA. In addition, you are reminded that operating under interim status does not relieve you from the need to comply with all applicable State and local requirements.

The printout enclosed with this letter identifies the limit(s) of the process design capacities your facility may use during the interim status period. This information was obtained from your Part A Permit application. If you wish to handle new wastes, to change processes, to increase the design capacity of existing processes, or to change ownership or operational control of the facility, you may do so only as provided in 40 CFR Sections 122.22 and 122.23.

As stated in the first paragraph of this letter, you have met the requirements of 40 CFR Part 122.23; your facility may operate under interim status until such time as a permit is issued or denied. This will be preceded by a request from this office or the State (if authorized) for Part B of your application. Please contact Arthur Kawatachi of my staff at (312) 886-7449, if you have any questions concerning this letter or the enclosure.

Sincerely,

Karl J. Klepitsch, Jr., Chief
Waste Management Branch

gcs
6/1/82

Enclosure



UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY
REGION 5
RCRA ACTIVITIES
P.O. BOX A3587
CHICAGO, ILLINOIS 60690

MAR 05 1991

SALCO, INC.
ATTN: KENNETH TARTER
704 CONANT
MONROE MI 48161

RE: EPA ID #: MID 000 722 728

In response to your request of 2-19-91 the following
information has been updated:

Name of installation to SALCO, INC.
Installation contact to KENNETH TARTER
Legal owner to SALCO, INC.
Generator status to VERY SMALL GENERATOR

If you have any questions, please contact me at (312) 886-6173.

Sincerely,

A handwritten signature in cursive script, appearing to read "Sharon Kiddon".

Sharon Kiddon
RCRA Notifications Coordinator
Waste Management Division

cc: State Agency
File

Please print or typewrite. SLATE type (12 characters per inch) in the unshaded areas only.

Form Approved OMB No. 2040-0026 Expires 10-31-91
EPA Form 8700-12

Please refer to the instructions for Filing Notification before completing this form. The information requested here is required by law (Section 3070 of the Resource Conservation and Recovery Act).



Notification of Regulated Waste Activity

United States Environmental Protection Agency

Date Received
(For Official Use Only)

I. Installation's EPA ID Number (Mark 'X' in the appropriate box)

<input type="checkbox"/> A. First Notification	<input checked="" type="checkbox"/> B. Subsequent Notification (complete item C)	C. Installation's EPA ID Number											
		M	I	D	0	0	0	7	2	2	7	2	8

II. Name of Installation (Include company and specific site name)

S A L C O , I N C .

III. Location of Installation (Physical address not P.O. Box or Route Number)

Street

7 0 4 C O N A N T

Street (continued)

City or Town State ZIP Code

M O N R O E M I 4 8 1 6 1 -

County Code County Name

M O N R O E

IV. Installation Mailing Address (See instructions)

Street or P.O. Box

7 0 4 C O N A N T

City or Town State ZIP Code

M O N R O E M I 4 8 1 6 1 -

V. Installation Contact (Person to be contacted regarding waste activities at site)

Name (last) (first)

T A R T E R K E N N E T H

Job Title Phone Number (area code and number)

P R E S I D E N T 3 1 2 - 2 4 2 - 2 8 2 0

VI. Installation Contact Address (See instructions)

A. Contact Address Location B. Street or P.O. Box

X

City or Town State ZIP Code

VII. Ownership (See instructions)

A. Name of Installation's Legal Owner

S A L C O , I N C .

Street, P.O. Box, or Route Number

7 0 4 C O N A N T

City or Town State ZIP Code

M O N R O E M I 4 8 1 6 1 -

Phone Number (area code and number) B. Land Type C. Owner Type D. Change of Owner Indicator (Date Changed) Month Day Year

3 1 3 - 2 4 3 - 2 8 2 0 P P Yes X No 0 7 1 7 8 7

EPA Form 8700-12 (07-89) Previous edition is obsolete.

RECEIVED

FEB 19 1991

U. S. EPA, REGION V
SWB - PMS

10 - For Official Use Only									

VIII. Type of Regulated Waste Activity (Mark 'X' in the appropriate boxes. Refer to Instructions.)

A. Hazardous Waste Activity		B. Used Oil Fuel Activities
<p>1. Generator (See Instructions)</p> <p><input type="checkbox"/> a. Greater than 1000kg/mo (2,200 lbs.)</p> <p><input checked="" type="checkbox"/> b. 100 to 1000 kg/mo (220 - 2,200 lbs.)</p> <p><input type="checkbox"/> c. Less than 100 kg/mo (220 lbs.)</p> <p>2. Transporter (Indicate Mode in boxes 1-5 below)</p> <p><input type="checkbox"/> a. For own waste only</p> <p><input type="checkbox"/> b. For commercial purposes</p> <p>Mode of Transportation</p> <p><input type="checkbox"/> 1. Air</p> <p><input type="checkbox"/> 2. Rail</p> <p><input type="checkbox"/> 3. Highway</p> <p><input type="checkbox"/> 4. Water</p> <p><input type="checkbox"/> 5. Other - specify </p>	<p><input type="checkbox"/> 3. Treater, Storer, Disposer (at installation)</p> <p>Note: A permit is required for this activity; see instructions.</p> <p>4. Hazardous Waste Fuel</p> <p><input type="checkbox"/> a. Generator Marketing to Burner</p> <p><input type="checkbox"/> b. Other Marketers</p> <p><input type="checkbox"/> c. Burner - indicate device(s) - Type of Combustion Device</p> <p><input type="checkbox"/> 1. Utility Boiler</p> <p><input type="checkbox"/> 2. Industrial Boiler</p> <p><input type="checkbox"/> 3. Industrial Furnace</p> <p><input type="checkbox"/> 5. Underground Injection Control</p>	<p>1. Off-Specification Used Oil Fuel</p> <p><input type="checkbox"/> a. Generator Marketing to Burner</p> <p><input checked="" type="checkbox"/> b. Other Marketer</p> <p><input type="checkbox"/> c. Burner - indicate device(s) - Type of Combustion Device</p> <p><input type="checkbox"/> 1. Utility Boiler</p> <p><input type="checkbox"/> 2. Industrial Boiler</p> <p><input type="checkbox"/> 3. Industrial Furnace</p> <p>2. Specification Used Oil Fuel Marketer (or On-site Burner) Who First Claims the Oil Meets the Specification</p> <p><input type="checkbox"/></p>

IX. Description of Regulated Wastes (Use additional sheets if necessary)

A. Characteristics of Nonlisted Hazardous Wastes. Mark 'X' in the boxes corresponding to the characteristic of nonlisted hazardous wastes your installation handles. (See 40 CFR Parts 261.20 - 261.24)

1. Ignitable (D001)	2. Corrosive (D002)	3. Reactive (D003)	4. Toxicity Characteristic (D000)
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

(List specific EPA hazardous waste number(s) for the Toxicity Characteristic contaminant(s))

--	--	--	--	--	--	--	--	--	--

B. Listed Hazardous Wastes. (See 40 CFR 261.31 - 33. See instructions if you need to list more than 12 waste codes.)


1	2	3	4	5	6
7	8	9	10	11	12

C. Other Wastes. (State other wastes requiring an I.D. number. See Instructions.)

1	2	3	4	5	6

X. Certification

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fines and imprisonment.

Signature 	Name and Official Title (Type and Print) William Nicikowski, Compliance Mgr.	Date Signed 2/15/91
--------------------------------------------------------------------------------------------------	---------------------------------------------------------------------------------	------------------------

XI. Comments

This notice is to clarify the name of this installation. Salco, Inc. was purchased by Kenneth Tarter on July 17, 1987. Salco, Inc. recycles used waste oil that is exempt from the RCRA definition of hazardous, pursuant to 40 C.F.R. Section 261.6(a)(3)(iii). The waste Salco generates is from regular clean-up operations and consists of soil mixed with spilled oil.

NOTE: Mail completed form to the appropriate EPA Regional or State Office. (See Section III of the booklet for addresses.)

LAW OFFICES
HONIGMAN MILLER SCHWARTZ AND COHN
2290 FIRST NATIONAL BUILDING
DETROIT, MICHIGAN 48226-3583
TELECOPIER (313) 962-0176
TELEX 235705

BETH GOTTHELF
DIRECT DIAL NUMBER
(313) 256-7688

5495
LANSING, MICHIGAN
WEST PALM BEACH, FLORIDA
TAMPA, FLORIDA
BOCA RATON, FLORIDA
HOUSTON, TEXAS
LOS ANGELES, CALIFORNIA

February 15, 1991

RCRA Activities
Region V
United States Environmental
Protection Agency
P.O. Box A3587
Chicago, Illinois 60690

Re: Salco, Inc.
Notification of Hazardous Activity Form

To Whom it May Concern:

Enclosed please find a copy of a revised United States Environmental Protection Agency ("EPA") Notification of Hazardous Waste Activity Form 8700-12 for processing.

Thank you for your prompt attention to this matter. If you have any questions please feel free to contact me.

Sincerely,

Beth Gotthelf 

Beth Gotthelf

BG:jdy

Enclosure

cc: Mr. Kenneth Tarter

C0220I

RECEIVED

FEB 19 1991

U. S. EPA, REGION V
SWB - PMS



ACKNOWLEDGEMENT OF NOTIFICATION
OF HAZARDOUS WASTE ACTIVITY
(VERIFICATION)

This is to acknowledge that you have filed a Notification of Hazardous Waste Activity for the installation located at the address shown in the box below to comply with Section 3010 of the Resource Conservation and Recovery Act (RCRA). Your EPA Identification Number for that installation appears in the box below. The EPA Identification Number must be included on all shipping manifests for transporting hazardous wastes; on all Annual Reports that generators of hazardous waste, and owners and operators of hazardous waste treatment, storage and disposal facilities must file with EPA; on all applications for a Federal Hazardous Waste Permit; and other hazardous waste management reports and documents required under Subtitle C of RCRA.

EPA I.D. NUMBER

MID000722728

SALCO CORP DBA SIS
704 CONANT ST
MONROE MI 48161

INSTALLATION ADDRESS

704 CONANT ST
MONROE MI 48161

EPA Form 8700-12B (4-80)

06/21/82

M 6-21-82

PAF



ACKNOWLEDGEMENT OF NOTIFICATION
OF HAZARDOUS WASTE ACTIVITY
(VERIFICATION)

This is to acknowledge that you have filed a Notification of Hazardous Waste Activity for the installation located at the address shown in the box below to comply with Section 3010 of the Resource Conservation and Recovery Act (RCRA). Your EPA Identification Number for that installation appears in the box below. The EPA Identification Number must be included on all shipping manifests for transporting hazardous wastes; on all Annual Reports that generators of hazardous waste, and owners and operators of hazardous waste treatment, storage and disposal facilities must file with EPA; on all applications for a Federal Hazardous Waste Permit; and other hazardous waste management reports and documents required under Subtitle C of RCRA.

EPA I.D. NUMBER

MID000722728

REACKNOWLEDGEMENT

COUSINS INDUSTRIAL SERVICE
PO BOX 2881 KENWOOD STATION
TOLEDO OH 43606

INSTALLATION ADDRESS

704 CONANT STREET
MONROE MI 48161

EPA Form 8700-12B (4-80)

10/03/81

EPAU.S. ENVIRONMENTAL PROTECTION AGENCY
NOTIFICATION OF HAZARDOUS WASTE ACTIVITY

INSTRUCTIONS: If you received a pre-printed label, affix it in the space at left. If any of the information on the label is incorrect, draw a line through it and supply the correct information in the appropriate section below. If the label is complete and correct, leave Items I, II, and III below blank. If you did not receive a pre-printed label, complete all items. "Installation" means a single site where hazardous waste is generated, treated, stored and/or disposed of, or a transporter's principal place of business. Please refer to the INSTRUCTIONS FOR FILING NOTIFICATION before completing this form. The information requested herein is required by law (Section 3010 of the Resource Conservation and Recovery Act).

INSTALLATION'S EPA I.D. NO.

~~Cousins Industrial Services~~

I. NAME OF INSTALLATION

~~SALCO (AFFILIATE OF COUSINS WASTE)~~

II. INSTALLATION MAILING ADDRESS

P.O. BOX - 2881 - KENWOOD STA.

TOLEDO, OH 43606 AUG 19 80

III. LOCATION OF INSTALLATION

704 CONANT ST.

MONROE, MI 48161

~~Change Name of Facility 3-11-81~~

FOR OFFICIAL USE ONLY

COMMENTS

INSTALLATION'S EPA I.D. NUMBER

APPROVED

DATE RECEIVED (yr., mo., & day)

SALCO CORP DBA SIS 6-15-82 MGP

M10000722728

A

800818

I. NAME OF INSTALLATION

~~SALCO (AFFILIATE OF COUSINS WASTE)~~
~~COUSINS INDUSTRIAL SERVICES~~

II. INSTALLATION MAILING ADDRESS

STREET OR P.O. BOX

~~PO BOX 2881 KENWOOD STATION~~704 CONANT ST 6-15-82 MGP
MONROE MI 48161

CITY OR TOWN

ST.

ZIP CODE

~~TOLEDO~~~~OH 43606~~

III. LOCATION OF INSTALLATION

STREET OR ROUTE NUMBER

704 CONANT STREET

CITY OR TOWN

ST.

ZIP CODE

MONROE

MI 48161

IV. INSTALLATION CONTACT

NAME AND TITLE (last, first, & job title)

PHONE NO. (area code & no.)

2 FULNER FRANK MANAGER

313-243-2820

V. OWNERSHIP

A. NAME OF INSTALLATION'S LEGAL OWNER

8 SALCO

B. TYPE OF OWNERSHIP (enter the appropriate letter into box)

VI. TYPE OF HAZARDOUS WASTE ACTIVITY (enter "X" in the appropriate box(es))

F = FEDERAL
M = NON-FEDERAL

M

☒ A. GENERATION☒ B. TRANSPORTATION (complete item VII)☒ C. TREAT/STORE/DISPOSE☐ D. UNDERGROUND INJECTION

VII. MODE OF TRANSPORTATION (transporters only - enter "X" in the appropriate box(es))

☐ A. AIR☐ B. RAIL☒ C. HIGHWAY☐ D. WATER☐ E. OTHER (specify):

VIII. FIRST OR SUBSEQUENT NOTIFICATION

Mark "X" in the appropriate box to indicate whether this is your installation's first notification of hazardous waste activity or a subsequent notification. If this is not your first notification, enter your Installation's EPA I.D. Number in the space provided below.

☒ A. FIRST NOTIFICATION☐ B. SUBSEQUENT NOTIFICATION (complete item C)

C. INSTALLATION'S EPA I.D. NO.

M10000722728

IX. DESCRIPTION OF HAZARDOUS WASTES

Please go to the reverse of this form and provide the requested information.

(SEE ATTACHED SHEET)
 SALCO (A AFFILIATE OF COUSINS WASTE,
 GENERATOR (AS A "MIXER")

I.D. - FOR OFFICIAL USE ONLY

W 11000072272821

IX. DESCRIPTION OF HAZARDOUS WASTES (continued from front)

A. HAZARDOUS WASTES FROM NON-SPECIFIC SOURCES. Enter the four-digit number from 40 CFR Part 261.31 for each listed hazardous waste from non-specific sources your installation handles. Use additional sheets if necessary.

1 F006 23 - 26	2 F007 23 - 26	3 F003 23 - 26	4 F001 23 - 26	5 F002 23 - 26	6 F005 23 - 26
7 F017 23 - 26	8 F018 23 - 26	9 23 - 26	10 23 - 26	11 23 - 26	12 23 - 26

B. HAZARDOUS WASTES FROM SPECIFIC SOURCES. Enter the four-digit number from 40 CFR Part 261.32 for each listed hazardous waste from specific industrial sources your installation handles. Use additional sheets if necessary.

13 K060 23 - 26	14 K061 23 - 26	15 K062 23 - 26	16 K063 23 - 26	17 K078 23 - 26	18 K079 23 - 26
19 K080 23 - 26	20 K081 23 - 26	21 K082 23 - 26	22 K086 23 - 26	23 23 - 26	24 23 - 26
25 23 - 26	26 23 - 26	27 23 - 26	28 23 - 26	29 23 - 26	30 23 - 26

C. COMMERCIAL CHEMICAL PRODUCT HAZARDOUS WASTES. Enter the four-digit number from 40 CFR Part 261.33 for each chemical substance your installation handles which may be a hazardous waste. Use additional sheets if necessary.

31 U002 23 - 26	32 U008 23 - 26	33 U019 23 - 26	34 U031 23 - 26	35 U080 23 - 26	36 U007 23 - 26
37 U112 23 - 26	38 U113 23 - 26	39 U140 23 - 26	40 U154 23 - 26	41 U159 23 - 26	42 U161 23 - 26
43 U211 23 - 26	44 U213 23 - 26	45 U220 23 - 26	46 U210 23 - 26	47 U226 23 - 26	48 U228 23 - 26

D. LISTED INFECTIOUS WASTES. Enter the four-digit number from 40 CFR Part 261.34 for each listed hazardous waste from hospitals, veterinary hospitals, medical and research laboratories your installation handles. Use additional sheets if necessary.

49 23 - 26	50 23 - 26	51 23 - 26	52 23 - 26	53 23 - 26	54 23 - 26
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E. CHARACTERISTICS OF NON-LISTED HAZARDOUS WASTES. Mark "X" in the boxes corresponding to the characteristics of non-listed hazardous wastes your installation handles. (See 40 CFR Parts 261.21 - 261.24.)

☒ 1. IGNITABLE
(D001)

☒ 2. CORROSIVE
(D002)

☒ 3. REACTIVE
(D003)

☒ 4. TOXIC
(D004)

X. CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

SIGNATURE MANAGER, FRANK FULNER	NAME & OFFICIAL TITLE (type or print) Frank Fulner	DATE SIGNED 8/15/80
------------------------------------	-------------------------------------------------------	------------------------

Salco

INDUSTRIAL
SERVICES

704 Conant St.
Monroe, Mich. 48161

Phone (313) 243-2820
Toledo (419) 255-6463

RECEIVED
June 9, 1982

JUN 10 1982

WASTE MANAGEMENT BRANCH
EPA, REGION V

g, T, TSD, PA

Gus Bloom
RCRA ACTIVITIES
REGION V
P.O. BOX A3587
Chicago, Ill. 60690

Dear Gus:

In accordance with our phone conversation this morning and per your instructions, I am making the following request:

Please send copies of our file, in particular the letter from Barry Cousins dated Dec. 15, 1980. The form #8700-12A should be in the original name of Salco dba Salco Industrial Services. Installation address should be the same, 704 Conant Street, Monroe Michigan, 48161.

Although Barry Cousins was with the firm for a short period of time, the name of the company has always been Salco. The owners name is now as it was then, Frank Fulner. Please send me a corrected form #8700-12A. At this point I have no form, only a copy, and no copies of any correspondence whatever. Our EPA # is MID 000722728.

Thank you so much for your assistance on this matter. If you need further information, please call me. I appreciate your help in getting this matter cleared up.

Sincerely,

Frank Fulner

Frank Fulner
Salco Industrial Service

cc: to Michigan DNR

cyonne / ff

RECEIVED
6/16/82

*Waste Oil *Dust Control *Industrial Waste

RESPONDENT CONTACT RECORD (RCR)

Facility ID Number MID000722728		Company Name SALCO(?)	
Company Address 704 Conant St		City Monroe	State MI
Contact Person's Name/Title Ms C. Shores		Zip Code 48161	
		Telephone Number (including area code) 313-243-2820	

CONTACT RECORD

Date	Contractor's Name	Items discussed/resolution
6/9/82	AB	Name change in response to Barry Cousins' letter was in error. (per CS) Mr Shores will send letter requesting change of name to "SALCO"
		P.O. Box is not appropriate for use. Mailing address should be changed to same as facility address.
		Barry Cousins was a partner. He has left the firm taking all EPA files. Copied and sent copies to Mr C Shores per her request (6/10/82)

COUSINS INDUSTRIAL SERVICES

704 Conant St.
Monroe, Mich. 48161

June 8, 1982

Mr. Arthur Kawatachi
U.S. Environmental
Protection Agency - Region V
111 W. Jackson Blvd.
Chicago, Illinois 60604

Dear Sir:

We are in receipt of your letter dated June 2, 1982, regarding RCRA activities. I have enclosed a copy of a letter sent to the Waste Management branch indicating a change in name and ownership.

In addition, we had chosen not to become a hazardous waste storage facility. Please mark your records accordingly.

Sincerely,

COUSINS INDUSTRIAL SERVICES



RECEIVED

JUN 10 1982

WASTE MANAGEMENT BRANCH
EPA, REGION V

Toledo-(419) 472-7766

Detroit-(313) 961-5957

Monroe-(313) 243-2820

Waste Oil • Chemical Waste • Vacuum Service

COUSINS INDUSTRIAL SERVICES

704 Conant St.
Monroe, Mich. 48161

April 30, 1982

RECEIVED

MAY 13 1982

WASTE MANAGEMENT BRANCH
EPA REGION V

U.S. EPA
Waste Management Branch
230 S. Dearborn Street
Chicago, ILL 60604

RE: EPA #MID 000 722 728 *JMB J.T., TSD, PA*

Gentlemen:

We wish to notify you of a change in name and mailing address of our company:

OLD NAME: Salco Corp. dba/Cousins Industrial Services

OLD MAILING

ADDRESS: P.O. Box 2881, Kenwood Station
Toledo, OH 43606

LOCATION: 704 Conant St.
Monroe, MI 48161

NEW NAME: Salco Corp. dba/S.I.S.

MAILING

ADDRESS & 704 Conant St.
LOCATION: Monroe, MI 48161

Sincerely,

Frank Fulner
Frank Fulner

FF/et

RECEIVED
5/14/82

Toledo-(419) 472-7766

Monroe-(313) 243-2820

Detroit-(313) 961-5957

Waste Oil • Chemical Waste • Vacuum Service

MID 000722728

COUSINS INDUSTRIAL SERVICES

704 Conant St.
Monroe, Mich. 48161

August 28, 1981

RECEIVED

SEP - 2 1981

WASTE MANAGEMENT BRANCH
EPA, REGION V

Irene Alexakos
U. S. EPA
Waste Management Branch
111 W. Jackson
Chicago, Illinois 60604

Dear Ms. Alexakos: /LIZ UTLEY

In compliance with your phone call, I have amended
page 3 of our part A [EPA Form 3510-1 (6-80)] .
Gallons have been converted to pounds, with appropriate
densities used in each case.

Respectfully,

Richard Hine

Richard Hine

Enclosure: corrected page 3.

cbs/rh

RECEIVED
10/22/81

SUB.

~~SEP 02 1981~~

SEP 28 1981

Toledo-(419) 472-7766

Monroe-(313) 243-2820

Detroit-(313) 961-5957

Waste Oil • Chemical Waste • Vacuum Service

EPA ID NUMBER (enter from page 1)										FOR OFFICIAL USE ONLY									
W 1 D 6 0 0 7 2 2 7 2 8										W 1 2 DUP									

DESCRIPTION OF HAZARDOUS WASTES (continued)

LINE NO.	A. EPA HAZARD. WASTE NO. (enter code)	B. ESTIMATED ANNUAL QUANTITY OF WASTE	C. UNIT OF MEASURE (enter code)	D. PROCESSES														
				1. PROCESS CODES (enter)				2. PROCESS DESCRIPTION (if a code is not entered in D(1))										
23	24	25	26	27	28	29	30	31	32	33	34	35	36	37	38	39	40	
1	F001	100000 10000	P A R T A C O R R E C T E D (G A L L O N S T O P O U N D S) A S P E R R E Q U E S T O F I R E N E A L E X A K O S, U. S. E P A, W A S T E M A N A G E M E N T B R A N C H, C H I C A G O, I L L I N O I S R. H I M E C O U S I N S I N D U S T R I A L S E R V I C E S 8/28/81	S01	S02													
2	F002	100000 10000		S01	S02													
3	F003	70000 10000		S01	S02													
4	F004	35000 5000		S01	S02													
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6	K078	105000 15000		S01	S02													
7	K079	160000 20000		S01	S02													
8	K080	80000 10000		S01														
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RECEIVED
10/22/81

COUSINS INDUSTRIAL SERVICES

Affiliate of Salco, Inc.
P.O. Box 2881 — Kenwood Station
Toledo, Ohio 43606

MJD0000722728

December 15, 1980

*Name has
been change
in sys.*

EPA Region V
RCRA Activities
P.O. Box 7861
Chicago, Illinois 60680

Gentlemen:

In our Application & Notification Part A, we indicated we would be changing our name from Salco (affiliate of Cousins Waste) to Cousins Industrial Services.

Could you please reissue EPA form 8700-12A (4-80) to reflect the new name.

I have enclosed the old acknowledgment for your reference.

Sincerely yours,

Barry Quinn

Barry Cousins
Cousins Industrial Services

BC/rl

Enclosure

*not in
Ohio*

*not in
system
can't find
number*

*This is in
Michigan*

DEC 16 1980

Toledo-(419) 472-7766

Detroit-(313) 961-5957

Waste Oil • Chemical Waste • Vacuum Service

Yard Location
704 Conant St.
Monroe, Mich. 48161
Monroe-(313) 243-2820

ATTACHMENT TO LPA FORM 1

SALCO (AFFILIATE OF COUSINS WASTE)
EPA I.D. NUMBER MID000722728
NOVEMBER 19, 1980

ITEM III NAME OF FACILITY

The facility name is going to be changed to COUSINS INDUSTRIAL SERVICES. However, to prevent confusion during the notification and application registration period, the SALCO name is being used to coincide with the August notification form which we submitted.

We will send in a separate notification of name change at a future date.

SALCO (AFFILIATE OF COUSINS WASTE) EPA NUMBER MID000722728
NOVEMBER 19, 1980

IV DESCRIPTION OF HAZARDOUS WASTES

Eleven wastes have been listed with their annual volume estimates for storage in tanks and drums at the facility. These are wastes which are handled with regularity, and stored temporarily prior to being shipped to disposal and/or reclamation facilities.

SALCO also, on occasion, picks up laboratory sample wastes, and stores them temporarily on the premises prior to trucking them to authorized disposal sites. These chemicals are in bottles and containers usually ranging in size from four ounces to thirty two ounces liquid, and up to ten pounds solid. These bottles and containers are segregated according to chemical classification (according to guidelines furnished by the CECOS landfill in Cincinnati) and packed in DOT approved drums containing no less than 50% by volume of inert filler such as perlite and vermiculite. This is all done in strict compliance to regulations supplied us by CECOS.

These materials can consist of various types of laboratory reagents, laboratory test samples of commercial chemical products, evaluation samples of our own customers wastes, etc. This means that these materials can be any of the hazardous materials listed in the May 19, 1980 Federal Register, Part 261.31, Part 261.32, Part 261.33, and Subpart C materials which are corrosive, reactive, or toxic. Also included would be samples of hazardous materials added to the list in the July 19, 1980 Federal Register.

The problem in trying to estimate and list these is obvious; we have no idea which of these, how much of each, or when we will be called upon to handle them. All we can say is that they would be in extremely small quantities, and far between.

Therefore I would like to submit a "blanket" estimate for these intermittent small quantities of as yet unknown lab chemicals:

Salco anticipates that during a years time it may be called upon to handle a total of 50 gallons and/or 200 pounds of laboratory wastes. These wastes are expected to be packaged in 4 ounce to 32 ounce (liquid) containers, and from four ounce to ten pound (solid) containers.

These wastes may be any of those listed in the May 19, 1980 Federal Register, Parts 261.31, 261.32, 261.33, and Subpart C corrosive, reactive, and toxic materials. Also include materials added in the July 19, 1980 Federal Register.

VIII FACILITY OWNER

The land on which SALCO is located is leased from

Mr. Roy S. Jones

538 Riverview, Monroe, MI 48161

Roy S. Jones 11/19/80

Mr. Jones is not involved in the operation of SALCO. He is landlord and property owner.

SALCO, INC.
(Affiliate of Cousins Waste Control)

704 Conant St.
Monroe, MI 48161

ATTACHMENT TO EPA FORM 8700-12 (6-80)

SALCO (Affiliate of Cousins Waste Control)
P. O. Box 2881
Kenwood Station
Toledo, Ohio 43606

1. This attachment is for the purpose of specifying the hazardous wastes handled in the TRANSPORTATION activity of Salco:

ITEM IX

The wastes transported are to include all wastes listed in 40 CFR 261.31, 261.32, and 261.33. Also include "Appendix A" wastes (F017, F018, and K070 through K092).

2. This attachment is for the purpose of specifying the hazardous wastes handled in the TREAT/STORE/DISPOSE activity of Salco:

ITEM IX

The wastes treated/stored/disposed are to include all wastes listed in 40 CFR 261.31, 261.32, and 261.33. Also include "Appendix A" wastes (F017, F018, and K070 through K092).

3. The four-digit numbers entered on form 8700-12 (6-80), Item IX, are for the GENERATION activity of Salco. This "generation" activity is that of a "transporter" who:

1. Imports hazardous waste
2. Mixes hazardous waste of different DOT shipping descriptions in a single container

In addition to those entered on the form, add this for 261.33: U239

For "importer" aspects of a generator:

Include all wastes listed in 40 CFR 261.31, 261.32, and 261.33. Also include "Appendix A" wastes (F017, F018, and K070 through K092).

4. ITEM V, OWNERSHIP:

The second owner of this installation is the owner of the leased land, Roy Jones.

FORM 1	EPA	U.S. ENVIRONMENTAL PROTECTION AGENCY GENERAL INFORMATION Consolidated Permits Program (Read the "General Instructions" before starting.)	I. EPA I.D. NUMBER FMID000722728																																																						
II. POLLUTANT CHARACTERISTICS <p>INSTRUCTIONS: Complete A through J to determine whether you need to submit any permit application forms to the EPA. If you answer "yes" to any questions, you must submit this form and the supplemental form listed in the parenthesis following the question. Mark "X" in the box in the third column if the supplemental form is attached. If you answer "no" to each question, you need not submit any of these forms. You may answer "no" if your activity is excluded from permit requirements; see Section C of the instructions. See also, Section D of the instructions for definitions of bold-faced terms.</p> <table border="1" style="width:100%; border-collapse: collapse;"> <thead> <tr> <th rowspan="2">SPECIFIC QUESTIONS</th> <th colspan="3">MARK 'X'</th> <th rowspan="2">SPECIFIC QUESTIONS</th> <th colspan="3">MARK 'X'</th> </tr> <tr> <th>YES</th> <th>NO</th> <th>FORM ATTACHED</th> <th>YES</th> <th>NO</th> <th>FORM ATTACHED</th> </tr> </thead> <tbody> <tr> <td>A. Is this facility a publicly owned treatment works which results in a discharge to waters of the U.S.? (FORM 2A)</td> <td></td> <td>X</td> <td></td> <td>B. Does or will this facility (either existing or proposed) include a concentrated animal feeding operation or aquatic animal production facility which results in a discharge to waters of the U.S.? (FORM 2B)</td> <td></td> <td>X</td> <td></td> </tr> <tr> <td>C. Is this a facility which currently results in discharges to waters of the U.S. other than those described in A or B above? (FORM 2C)</td> <td></td> <td>X</td> <td></td> <td>D. Is this a proposed facility (other than those described in A or B above) which will result in a discharge to waters of the U.S.? (FORM 2D)</td> <td></td> <td>X</td> <td></td> </tr> <tr> <td>E. Does or will this facility treat, store, or dispose of hazardous wastes? (FORM 3)</td> <td>X</td> <td></td> <td>X</td> <td>F. Do you or will you inject at this facility industrial or municipal effluent below the lowermost stratum containing, within one quarter mile of the well bore, underground sources of drinking water? (FORM 4)</td> <td></td> <td>X</td> <td></td> </tr> <tr> <td>G. Do you or will you inject at this facility any produced water or other fluids which are brought to the surface in connection with conventional oil or natural gas production, inject fluids used for enhanced recovery of oil or natural gas, or inject fluids for storage of liquid hydrocarbons? (FORM 4)</td> <td></td> <td>X</td> <td></td> <td>H. Do you or will you inject at this facility fluids for special processes such as mining of sulfur by the Frasch process, solution mining of minerals, in situ combustion of fossil fuel, or recovery of geothermal energy? (FORM 4)</td> <td></td> <td>X</td> <td></td> </tr> <tr> <td>I. 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Refer to the instructions for detailed item descriptions and for the legal authorizations under which this data is collected.</p>
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115																	

CONTINUED FROM THE FRONT

VII. SIC CODES (4-digit, in order of priority)

A. FIRST										B. SECOND													
C	7	4	2	1	3	(specify)	TRUCKING EXCEPT LOCAL					C	7	4	2	1	4	(specify)	LOCAL TRUCKING WITH STORAGE				
15	16	17	18	19			15	16	17	18	19												
C. THIRD										D. FOURTH													
C	7					(specify)		C	7					(specify)									
15	16	17	18	19			15	16	17	18	19												

VIII. OPERATOR INFORMATION

A. NAME																									B. Is the name listed in Item VIII-A also the owner?					
C	8	SALCO (AFFILIATE OF COUSINS WASTE)																												
15	16																								66					
C. STATUS OF OPERATOR (Enter the appropriate letter into the answer box; if "Other", specify.)																									D. PHONE (area code & no.)					
F = FEDERAL M = PUBLIC (other than federal or state) P (specify) S = STATE O = OTHER (specify)																									C A 3 1 3 2 4 3 2 8 2 0 15 16 17 18 19 20 21 22 23 24 25					
E. STREET OR P.O. BOX																														
704 CONANT STREET																														
F. CITY OR TOWN																									G. STATE		H. ZIP CODE		IX. INDIAN LAND	
MONROE																									MI		48161		Is the facility located on Indian lands?	
																													<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO 52	

X. EXISTING ENVIRONMENTAL PERMITS

A. NPDES (Discharges to Surface Water)										D. PSD (Air Emissions from Proposed Sources)										
C	9	N								C	9	P								
15	16	17	18	19	20	21	22	23	24	15	16	17	18	19	20	21	22	23	24	
B. UIC (Underground Injection of Fluids)										E. OTHER (specify)										
C	9	U								C	9	7	DNR#H-366							(specify)
15	16	17	18	19	20	21	22	23	24	15	16	17	18	19	20	21	22	23	24	
C. RCRA (Hazardous Wastes)										E. OTHER (specify)										
C	9	R								C	9									(specify)
15	16	17	18	19	20	21	22	23	24	15	16	17	18	19	20	21	22	23	24	

XI. MAP

Attach to this application a topographic map of the area extending to at least one mile beyond property boundaries. The map must show the outline of the facility, the location of each of its existing and proposed intake and discharge structures, each of its hazardous waste treatment, storage, or disposal facilities, and each well where it injects fluids underground. Include all springs, rivers and other surface water bodies in the map area. See instructions for precise requirements.

F9: A/50

XII. NATURE OF BUSINESS (provide a brief description)

HAULING TO DISPOSAL SITES: ACIDS, AQUEOUS WASTE, SOLUBLES, COMBUSTABLE WASTE, PLATING WASTE.

BUY WASTE OIL.

VACUUM TRUCK SERVICE: PUMP OUT OIL PONDS, TANKS, CHEMICALS, TANK CLEANING

DUST CONTROL: USING CALCIUM CHLORIDE.

SLUDGE HAULING AND DISPOSAL.

DUST COLLECTION: FROM BAGHOUSE COLLECTORS OR ELECTROSTATIC PRECIPITATORS.

F9: A/51

XIII. CERTIFICATION (see instructions)

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this application and all attachments and that, based on my inquiry of those persons immediately responsible for obtaining the information contained in the application, I believe that the information is true, accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

A. NAME & OFFICIAL TITLE (type or print)	B. SIGNATURE	C. DATE SIGNED
FRANK FULNER VICE PRES. AND GENERAL MGR.	<i>Frank Fulner</i>	11-19-80

COMMENTS FOR OFFICIAL USE ONLY

C	15	16	17	18	19	20	21	22	23	24	25

CONTINUE ON REVERSE

III. PROCESSES (continued)

C. SPACE FOR ADDITIONAL PROCESS CODES OR FOR DESCRIBING OTHER PROCESSES (code "T04"). FOR EACH PROCESS ENTERED HERE INCLUDE DESIGN CAPACITY.

IV. DESCRIPTION OF HAZARDOUS WASTES

A. EPA HAZARDOUS WASTE NUMBER — Enter the four-digit number from 40 CFR, Subpart D for each listed hazardous waste you will handle. If you handle hazardous wastes which are not listed in 40 CFR, Subpart D, enter the four-digit number(s) from 40 CFR, Subpart C that describes the characteristics and/or the toxic contaminants of those hazardous wastes.

B. ESTIMATED ANNUAL QUANTITY — For each listed waste entered in column A estimate the quantity of that waste that will be handled on an annual basis. For each characteristic or toxic contaminant entered in column A estimate the total annual quantity of all the non-listed waste(s) that will be handled which possess that characteristic or contaminant.

C. UNIT OF MEASURE — For each quantity entered in column B enter the unit of measure code. Units of measure which must be used and the appropriate codes are:

ENGLISH UNIT OF MEASURE CODE
POUNDS P
TONS T

METRIC UNIT OF MEASURE CODE
KILOGRAMS K
METRIC TONS M

If facility records use any other unit of measure for quantity, the units of measure must be converted into one of the required units of measure taking into account the appropriate density or specific gravity of the waste.

D. PROCESSES**1. PROCESS CODES:**

For listed hazardous waste: For each listed hazardous waste entered in column A select the code(s) from the list of process codes contained in Item III to indicate how the waste will be stored, treated, and/or disposed of at the facility.

For non-listed hazardous wastes: For each characteristic or toxic contaminant entered in column A, select the code(s) from the list of process codes contained in Item III to indicate all the processes that will be used to store, treat, and/or dispose of all the non-listed hazardous wastes that possess that characteristic or toxic contaminant.

Note: Four spaces are provided for entering process codes. If more are needed: (1) Enter the first three as described above; (2) Enter "000" in the extreme right box of Item IV-D(1); and (3) Enter in the space provided on page 4, the line number and the additional code(s).

2. PROCESS DESCRIPTION: If a code is not listed for a process that will be used, describe the process in the space provided on the form.

NOTE: HAZARDOUS WASTES DESCRIBED BY MORE THAN ONE EPA HAZARDOUS WASTE NUMBER — Hazardous wastes that can be described by more than one EPA Hazardous Waste Number shall be described on the form as follows:

1. Select one of the EPA Hazardous Waste Numbers and enter it in column A. On the same line complete columns B, C, and D by estimating the total annual quantity of the waste and describing all the processes to be used to treat, store, and/or dispose of the waste.
2. In column A of the next line enter the other EPA Hazardous Waste Number that can be used to describe the waste. In column D(2) on that line enter "included with above" and make no other entries on that line.
3. Repeat step 2 for each other EPA Hazardous Waste Number that can be used to describe the hazardous waste.

EXAMPLE FOR COMPLETING ITEM IV (shown in line numbers X-1, X-2, X-3, and X-4 below) — A facility will treat and dispose of an estimated 900 pounds per year of chrome shavings from leather tanning and finishing operation. In addition, the facility will treat and dispose of three non-listed wastes. Two wastes are corrosive only and there will be an estimated 200 pounds per year of each waste. The other waste is corrosive and ignitable and there will be an estimated 100 pounds per year of that waste. Treatment will be in an incinerator and disposal will be in a landfill.

W Z J Z	A. EPA HAZARD. WASTE NO. (enter code)	B. ESTIMATED ANNUAL QUANTITY OF WASTE	C. UNIT OF MEAS- URE (enter code)	D. PROCESSES	
				1. PROCESS CODES (enter)	2. PROCESS DESCRIPTION (if a code is not entered in D(1))
X-1	K 0 5 4	900	P	T 0 3 D 8 0	
X-2	D 0 0 2	400	P	T 0 3 D 8 0	
X-3	D 0 0 1	100	P	T 0 3 D 8 0	
X-4	D 0 0 2				included with above

CONTINUE ON REVERSE

IV. DESCRIPTION OF HAZARDOUS WASTES (continued)

E. USE THIS SPACE TO LIST ADDITIONAL PROCESS CODES FROM ITEM D(1) ON PAGE 3.

EPA I.D. NO. (enter from page 1)

F M I D 0 0 0 7 2 2 7 2 8 3 6

V. FACILITY DRAWING

All existing facilities must include in the space provided on page 5 a scale drawing of the facility (see instructions for more detail).

F6: N/55

VI. PHOTOGRAPHS

All existing facilities must include photographs (aerial or ground-level) that clearly delineate all existing structures; existing storage, treatment and disposal areas; and sites of future storage, treatment or disposal areas (see instructions for more detail).

F6: N

VII. FACILITY GEOGRAPHIC LOCATION

LATITUDE (degrees, minutes, & seconds)

41 54 100

LONGITUDE (degrees, minutes, & seconds)

083 23 050

VIII. FACILITY OWNER

☒ A. If the facility owner is also the facility operator as listed in Section VIII on Form 1, "General Information", place an "X" in the box to the left and skip to Section IX below.

B. If the facility owner is not the facility operator as listed in Section VIII on Form 1, complete the following items:

1. NAME OF FACILITY'S LEGAL OWNER

2. PHONE NO. (area code & no.)

E

15 16

55 56

58 59

61 62

63

3. STREET OR P.O. BOX

4. CITY OR TOWN

5. ST.

6. ZIP CODE

F

15 16

45 15 16

40 41 42

47 48 49

51

IX. OWNER CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

A. NAME (print or type)

FRANK FULNER

VICE
PRESIDENT

B. SIGNATURE

Frank Fulner

C. DATE SIGNED

11-19-80

X. OPERATOR CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

A. NAME (print or type)

FRANK FULNER

VICE
PRESIDENT

B. SIGNATURE

Frank Fulner

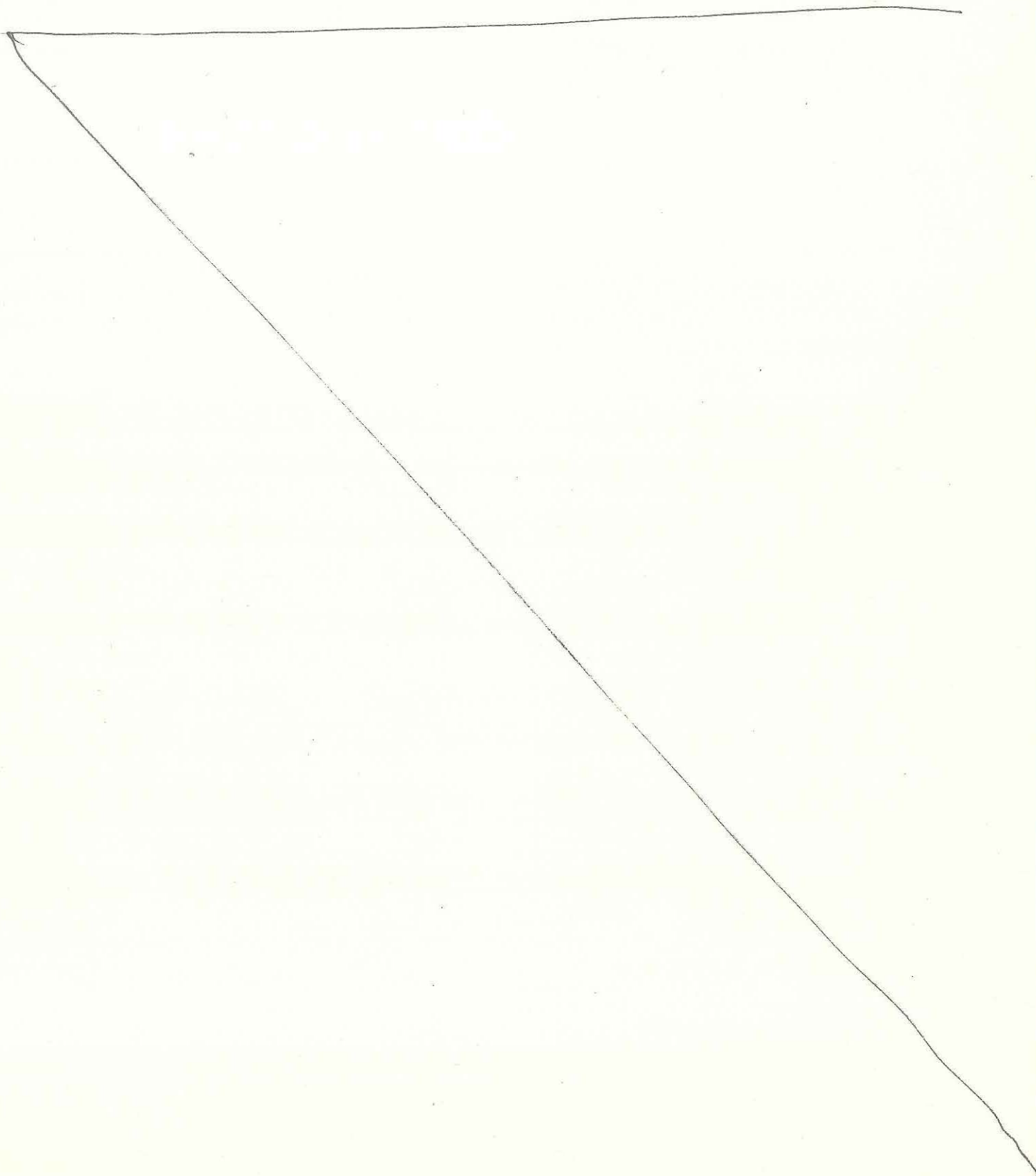
C. DATE SIGNED

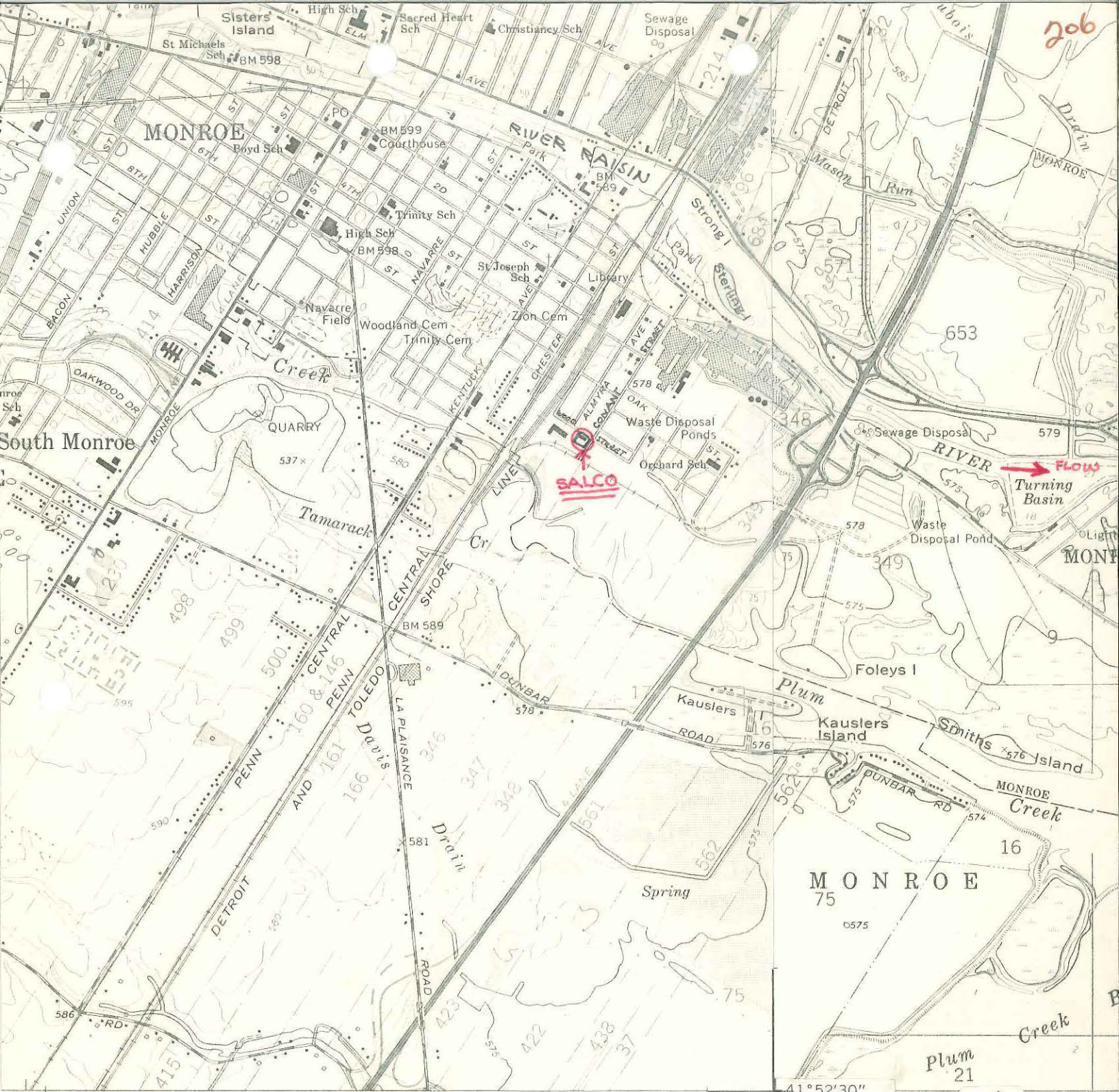
11-19-80

V. FACILITY DRAWING (see page 4)

"NEW FACILITY"

COMMENCED STORING DRUMS OF CHEMICAL WASTE,
FOR SHIPMENT, AT ABOUT JANUARY 1, 1977.





25° 15' R 9 E. 300 15 MI. TO INTERSTATE 280 TOLEDO, OHIO (CH.) 18 MI. INTERIOR—GEOLOGICAL SURVEY, RESTON, VIRGINIA—1979 30200m E. 41° 52' 30" 83° 22' 30"

MILE (EPA NO (SALCO) MID 000722728)

ROAD CLASSIFICATION
 Heavy-duty ——— Light-duty ———
 Medium-duty ——— Unimproved dirt - - - - -
 Interstate Route U.S. Route State Route



QUADRANGLE LOCATION

Revisions shown in purple compiled from aerial photographs taken 1977. Map edited 1979
 This information not field checked
 Purple tint indicates extension of urban area

LOCATION MAP: FORM 1 ITEM XI

MONROE, MICH.
 N4152.5—W8322.5/7.5

1967
 PHOTOREVISED 1979
 DMA 4367 IV NW—SERIES V862

SALCO (AFFILIATE OF COUSINS WASTE)
 704 CONANT STREET
 MONROE, MI. 48161

UTM GRID AND 1967 MAGNETIC NORTH DECLINATION AT CENTER OF SHEET
 2 1/2° 44 MILS 1° 33' 27 MILS
 1 MILE

MAP INCLUDED WITH SALCO
APPLICATION FOR HAZARDOUS WASTE
PERMIT

FORM 1

ITEM XI

COUSINS INDUSTRIAL SERVICES

Affiliate of Salco, Inc.
P.O. Box 2881 — Kenwood Station
Toledo, Ohio 43606
MID000722728

December 15, 1980

*Sub. Part A
check name on notif.*

Change Name of facility 3-11-81 as

EPA Region V
RCRA Activities
P.O. Box 7861
Chicago, Illinois 60680

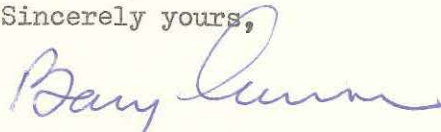
Gentlemen:

In our Application & Notification Part A, we indicated we would be changing our name from Salco (affiliate of Cousins Waste) to Cousins Industrial Services.

Could you please reissue EPA form 8700-12A (4-80) to reflect the new name.

I have enclosed the old acknowledgment for your reference.

Sincerely yours,



Barry Cousins
Cousins Industrial Services

BC/rl

Enclosure

DEC 16 1980

Toledo-(419) 472-7766

Detroit-(313) 961-5957
Waste Oil • Chemical Waste • Vacuum Service

Yard Location
704 Conant St.
Monroe, Mich. 48161
Monroe-(313) 243-2820

ENVIRONMENTAL PROTECTION AGENCY
GENERATOR BIENNIAL HAZARDOUS WASTE REPORT FOR 1983

This report is for the calendar year ending December 31, 1983.
Read All Instructions Carefully Before Making Any Entries on Form

I. NON-REGULATED STATUS

Complete this section only if you did not generate regulated quantities of hazardous waste at any time during the 1983 calendar year. Circle the one code at right that best describes your status during the entire year (see instructions for explanation of codes).

- ① Non-handler
2 Small Quantity Generator
4 Exempt
5 Beneficial Use
9 Closed

Please print/type with elite type (12 characters per inch)

II. GENERATOR'S EPA I.D. NUMBER

T/A C
FM100007227281
1 2 13 14 15

This Installation's Non-Regulated Status is Expected to Apply:

- ☒ For 1983 Only ☐ Permanently
☐ Other _____

C303 ENTRY (OFFICIAL USE ONLY): ☐

III. NAME OF INSTALLATION

SALCO INDUSTRIAL SERVICES
30 69

IV. INSTALLATION MAILING ADDRESS

37041 CONANT STREET
15 16 45

Street or P.O. Box

4 MONROE MI 48161
15 16 41 42 47 51
City or Town State Zip Code

V. LOCATION OF INSTALLATION (if different than section IV above)

5
15 16 45
Street or Route number

6
15 16 41 42 47 51
City or Town State Zip Code

VI. INSTALLATION CONTACT

2 FULNER FRANK
15 16 45
Name (last and first)

311 31-2413-12820
46 55
Phone No. (area code & no.)

VII. CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

FRANK FULNER GEN. MGR. Frank Fulner 2/27/84
Print/Type Name Title Signature of Authorized Representative Date Signed

ENVIRONMENTAL PROTECTION AGENCY
FACILITY BIENNIAL HAZARDOUS WASTE REPORT FOR 1983

This report is for the calendar year ending December 31, 1983.
 Read All Instructions Carefully Before Making Any Entries on Form

I. NON-REGULATED STATUS

Explain your non-regulated status in the space below.

See instructions before completing this section.

This facility did not treat, store, or dispose of
 regulated quantities of hazardous waste at any
 time during 1983. ☐

Please print/type with elite type (12 characters per inch)

II. FACILITY EPA I.D. NUMBER

F M I D 0 0 0 7 2 2 7 2 8 1
 1 2 13 14 15

T/A C

This Facility's Non-Regulated Status is Expected to Apply:

- ☐ For 1983 Only ☐ Permanently
☐ Other (explain in comment section)

C303 ENTRY (OFFICIAL USE ONLY): ☐**III. NAME OF FACILITY**

SALCO INDUSTRIAL SERVICES
 30 69

IV. FACILITY MAILING ADDRESS

3704 CONANT STREET
 15 16 45

Street or P.O. Box

4 MONROE MI 48161
 15 16 41 42 47 51

City or Town

State Zip Code

V. LOCATION OF FACILITY (if different than section IV above)

5
 15 16 45

Street or Route number

6
 15 16 41 42 47 51

City or Town

State Zip Code

VI. FACILITY CONTACT

2 FULNER FRANK
 15 16 45

Name (last and first)

313-243-2820
 46 55

Phone No. (area code & no.)

VII. COST ESTIMATES FOR FACILITIES

\$ 16 19 22 25 28 31
 A. Cost Estimate for Facility Closure B. Cost Estimate for Post Closure Monitoring and Maintenance (disposal facilities only)

VIII. CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

FRANK FULNER PRESIDENT

Print/Type Name

Title

Frank Fulner
 Signature of Authorized Representative

Date Signed

Facility Biennial Hazardous Waste Report for 1983 (cont.)

This report is for the calendar year ending December 31, 1983.

Date rec'd: _____ Rec'd by: _____

IX. FACILITY'S EPA I.D. NO.

T/A C

F	M	I	D	O	O	T	2	2	7	2	8			1
1	2										13	14	15	

X. GENERATOR'S EPA I.D. NO.

G 0 H D 0 9 7 2 4 0 0 9 7
16 28

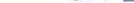




XI. GENERATOR NAME (specify generator from whom all wastes on this page were received)

STROH CONTAINER ON-SITE ☐

XII. GENERATOR ADDRESS

2145 CEDAR
FREMONT, OHIO 43420

XIII. TOTAL WASTE IN STORAGE ON DECEMBER 31, 1983 (complete this section only once for your facility)

S01  AMOUNT OF WASTE UOM S02  AMOUNT OF WASTE UOM S03  AMOUNT OF WASTE UOM
S04  AMOUNT OF WASTE UOM S05  AMOUNT OF WASTE UOM

XIV. WASTE IDENTIFICATION

[illegible]

XV. COMMENTS (enter information by section number—see instructions)

XIV 1. DENSITY ≈ 6.7 lb/GAL.

2. DENSITY $\approx 6.6 \text{ lb/GAL.}$

3. DENSITY ≈ 6.7 lb/GAL.

STORED UNTIL TRANSPORTED TO
SOLVENT RECYCLER : U.S. CHEMICAL.

XIII CEASED HAZARDOUS WASTE STORAGE ACTIVITIES ON 6/30/83.
PRESENTLY UNDERGOING "CLOSURE" PROCEEDINGS FOR HAZARDOUS
WASTE STORAGE.

Facility Biennial Hazardous Waste Report for 1983 (cont.)

This report is for the calendar year ending December 31, 1983.

Date rec'd: _____ Rec'd by: _____

IX. FACILITY'S EPA I.D. NO.

T/A C

F M I D O O O 7 2 2 7 2 8 1 1
1 2 13 14 15

X. GENERATOR'S EPA I.D. NO.

G O H D O P 5 0 3 4 4 5 9
16 28

XI. GENERATOR NAME (specify generator from whom all wastes on this page were received)

LIBBEY GLASS

DIV. OF OWENS ILLINOIS

ON-SITE ☐

XII. GENERATOR ADDRESS

1201 BUCKEYE ST.

TOLEDO, OHIO 43611

XIII. TOTAL WASTE IN STORAGE ON DECEMBER 31, 1983 (complete this section only once for your facility)

S01	AMOUNT OF WASTE	UOM	S02	AMOUNT OF WASTE	UOM	S03	AMOUNT OF WASTE	UOM
S04	AMOUNT OF WASTE	UOM	S05	AMOUNT OF WASTE	UOM			

XIV. WASTE IDENTIFICATION

Sequence #	Line #	A. Description of Waste	B. EPA Hazardous Waste No. (see instructions)	C. Handling Method	D. Amount of Waste	E. Unit of Measure
29	32	1 PLASTIC PIPE SECTIONS CONTAMINATED WITH CHROMIC ACID "SLUDGE" SOLIDS	D10 0 7 33 36 37 40 D10 0 2 41 44 45 48 49 51 52	S01	30	P
	2					
	3					
	4					
	5					
	6					
	7					
	8					
	9					
	10					
	11					
	12					

XV. COMMENTS (enter information by section number—see instructions)

XIV 1. WASTE REJECTED BY FIRST DISPOSAL SITE. STORED UNTIL A NEW DISPOSAL SITE ACCEPTED IT. IT WAS REMANIFESTED & TRANSPORTED TO THE SECOND DISPOSAL SITE : WAYNE DISPOSAL.

Tear out here

NATURAL RESOURCES COMMISSION
THOMAS J. ANDERSON
MARLENE J. FLUHARTY
KERRY KAMMER
O. STEWART MYERS
DAVID D. OLSON
RAYMOND POUPORE

STATE OF MICHIGAN



JAMES J. BLANCHARD, Governor

DEPARTMENT OF NATURAL RESOURCES

STEVENS T. MASON BUILDING

BOX 30028

LANSING, MI 48909

GORDON E. GUYER, Director

RECEIVED

September 3, 1987

SEP 10 1987

Mr. Ken Tarter
Salco Industrial Services, Inc.
704 Conant Street
Monroe, Michigan 48161

SOLID WASTE DIVISION
U.S. EPA, REGION V

Dear Mr. Tarter:

Enclosed is a list of requirements for the initial sampling of soils under tank number six.

As we discussed when we met at your facility last week, sampling must be done to insure that no contamination has resulted from the hazardous wastes managed in tank number six. The results from this initial sampling will be used to determine if more sampling and cleanup are necessary. If no contamination is found, your facility can be certified as clean closed. However, this closure certification will not release you from the corrective action requirements of Section 3004(u) of the Resource Conservation and Recovery Act. Corrective action can be required for contamination resulting from any solid waste management unit.

The sampling and testing procedures must be performed according to the requirements in the attachment. The analytical results and lab QA/QC with detection limits must be sent to Ms. Nadine Romero at the address below. In addition, please contact Mr. Larry Aubuchon at 313-344-4670 at least two days prior to the sampling date.

Department of Natural Resources
Waste Management Division
P.O. Box 30038
Lansing, Michigan 48909
Attention: Ms. Nadine Romero

Please contact me if you have any questions.

Sincerely,

Steven R. Sliver, Engineer
Waste Management Division
517-373-2730

Enclosure

cc: Mr. Ken Burda/C&E File
Ms. Nadine Romero
Mr. Larry Aubuchon
Ms. Marilyn Sabadaska

Salco Industrial Services, Inc.
MID 000 722 728

Initial Soil Sampling
Tank No. 6

A total of 4 samples are required for the initial soil sampling for tank number six. Included is one sample to be used to determine the background levels of heavy metals in the soil. The following sampling and testing procedures must be followed.

Background Sample

The background sample should come from the road along the south fence line, in the same control area used in the 1985 sampling (midway between east and west fence lines). The sample must be taken at a 6-inch soil depth. A total metals (dry-weight basis, mg/kg) test must be conducted according to the test methods provided below, with detection limits no greater than 1 part per million.

<u>Parameter</u>	<u>SW-846 Test Method Number</u>	<u>Methods for Chemical Analysis of Water and Wastes*</u>
Chromium	7190	_____
Copper	7210	_____
Lead	7420	_____
Manganese	_____	243.1
Titanium	_____	283.1
Zinc	7950	_____

* US EPA - 600/4-79-020

Tank Samples

Three samples from under the tank will be required. The area where the tank was originally located should be divided into thirds, and one sample taken from the midpoint of each section. Since the tank is 5 feet in diameter by 20 feet long, each section will be approximately 5 feet wide by 7 feet long.

The samples must be taken at a 6-inch soil depth (6-inches below bottom of the surface gravel layer). A total metals test must be conducted on each sample (as described for the background sample). These samples must also be tested for the following organics, with detection limits no greater than one part per billion.

<u>Parameter</u>	<u>SW-846 Test Method Number</u>
1,1,1-trichloroethane	8010
Toluene	8020
Xylene	8020
Methylethyl Ketone	8015

A.4 Closure

01 MAY 1986

Carol
FILE COPY

5HS-13-JCK

CERTIFIED MAIL

RETURN RECEIPT REQUESTED

Mr. Frank Fulner
General Manager
Salco Industrial Services
704 Conant Street
Monroe, MI 60604

RE: Closure Certification
Salco Industrial Services
Monroe, MI
MID 000 722 728

Dear Mr. Fulner:

We have reviewed your October 21, 1985 closure certification for the container and tank storage areas at the referenced facility and have found it incomplete. As per 40 CFR 265.115 when closure is complete the owner or operator must submit to the Regional Administrator certification both by the owner or operator and by an independent registered professional engineer, that the facility has been closed in accordance with the specifications in the approved closure plan. We have not received a certification statement from the owner or operator. Please submit two copies of the certification to this office within 30 days of the date of this letter.

During our review of the closure activities at the site we found documentation that releases of hazardous waste or hazard constituents have occurred around Tank #6. Therefore, you must submit a plan for determining the nature and extent of the soil and possible groundwater contamination and take appropriate corrective action. You must follow the criteria set in the Michigan Department of Natural Resources', "How Clean Is Clean?", guidance (Attachment 1). Please submit two copies of this plan to this office by June 20, 1986.

If you have any questions regarding this matter, please contact Carol Witt of my staff at (312) 886-6146 or Pete Quackenbush of the MDNR at (517) 373-2730, for assistance.

Sincerely,

Y. J. Kim, Acting Chief
Technical Programs Section

Attachment

cc: Alan Howard, MDNR
Bill Muno, MEB

5HS-13:SWB:TPS:MI:C.WITT:J.DAVIS:DRAFT 4/10
DISK 11

STATE OF MICHIGAN



NATURAL RESOURCES COMMISSION

MAS J. ANDERSON
JENE J. FLUHARTY
STEPHEN V. MONSMA
O. STEWART MYERS
DAVID D. OLSON
RAYMOND POUPORE
HARRY H. WHITELEY

JAMES J. BLANCHARD, Governor

DEPARTMENT OF NATURAL RESOURCES

STEVENS T. MASON BUILDING
BOX 30028
LANSING, MI 48909

RONALD O. SKOOG, Director

February 10, 1986

Ms. Edith Ardiente, Chief
Technical Programs Section
U.S. EPA - Region V
230 S. Dearborn
Chicago, Illinois 60604

Re: Salco Industrial Services
MID 000722728

Dear Ms. Ardiente:

The purpose of this letter is to provide you with comments on the closure certification submitted by Salco Industrial Services of Monroe, Michigan. Our District staff had inspected the facility since closure and verified that closure has been completed in accordance with the approved closure plan. We have no further recommendations for this facility for the time being.

Sincerely,

A handwritten signature in dark ink, appearing to read "Philip R. Roycraft", written over a horizontal line.

Philip R. Roycraft
Technical Services Section
Hazardous Waste Division
517-373-2730

cc: Mr. L. Aubuchon
Ms. M. Murphy
C&E File



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 5

230 SOUTH DEARBORN ST.

CHICAGO, ILLINOIS 60604

REPLY TO THE ATTENTION OF:

5HS-13

NOV 26 1985

Mr. Alan J. Howard, Chief
Technical Services Section
Hazardous Waste Division
Michigan Department of Natural Resources
P.O. Box 30028
Lansing, Michigan 48909

RE: Closure Plan *Certification*
Salco Industrial Services
Monroe, MI
MID 000 722 728

Dear Mr. Howard:

Enclosed is/are one (1) *certification* copy(s) of a closure plan for the
referenced facility. Please perform a technical evaluation of the *certification* plan, and
provide us your comments by January 25, 1986.

If you have any questions on the closure plan, *certification* please contact Carol Witt
of my staff, at (312) 886-6146.

Sincerely,

Edith M. Ardiente

Edith M. Ardiente, P.E.
Chief, Technical Programs Section

Enclosure(s)

cc: Mary Higgins
HWDMS Update File

	TYP.	AUTH.	IL. CHIEF	IN. CHIEF	ML CHIEF	MM/MI CHIEF	OL CHIEF	TPS CHIEF	WHS CHIEF	WFO CHIEF
INT. DATE	<i>11-25-85</i>	<i>CW</i>			<i>11-25-85</i>					

SFL-5

5HS-13

NOV 26 1985

CERTIFIED MAIL P 511 589 373
RETURN RECEIPT REQUESTED

Mr. Frank Fulner
General Manager
Salco Industrial Services
704 Conant Street
Monroe, MI 48161

RE: Closure
Salco Industrial Services
Monroe, MI
MID 000 722 728

Dear Mr. Fulner:

As you know, you have previously submitted Part A of the Resource Conservation and Recovery Act (RCRA) permit application for the above-referenced facility. Timely submission of "the Part A" has allowed most hazardous waste management facilities to continue to operate under RCRA "interim status", while complying with applicable 40 CFR Part 265 standards.

On November 8, 1984, the Hazardous and Solid Waste Amendments of 1984 (the 1984 Amendments) were enacted to modify RCRA. Under the 1984 Amendments, all RCRA permits issued after the date of enactment must provide for corrective action for all releases of hazardous waste or hazardous waste constituents from any solid waste management unit, regardless of the time at which waste was placed in the unit. In addition, all interim status facilities are subject to corrective action requirements, regardless of whether they have 1) submitted a Part B application, 2) submitted a closure plan, 3) reverted to generator status only, 4) actually closed, or 5) none of these. Unless our Agency has formally terminated the facility's interim status, the corrective action requirements apply. Please note that both hazardous and non-hazardous waste can meet the definition of solid waste under 40 CFR 261.2.

5HS-JCK-13 WMD:SWB:TPS:MI

Carol Witt Unit

P 611 589 373

Salco Industrial Services

RECEIPT FOR CERTIFIED MAIL

NO INSURANCE COVERAGE PROVIDED

NOT FOR INTERNATIONAL MAIL

MI D 000 722 728

(See Reverse)

★ U.S.G.P.O. 1983-403-517

PS Form 3800, Feb. 1982

Sent to	Mr. Frank Fulner
Street and No.	704 Conant St.
P.O., State and ZIP Code	Michigan 48161
Postage	\$ 39
Certified Fee	\$ 75
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt Showing to whom and Date Delivered	70
Return receipt showing to whom, Date, and Address of Delivery	
TOTAL Postage and Fees	\$ 1.84
Postmark or Date	

HSJCK-13:WMD:SWB:TPS:
MI Unit: Carol Witt

UNITED STATES POSTAL SERVICE

OFFICIAL BUSINESS

SENDER INSTRUCTIONS

Print your name, address, and ZIP Code in the space below.

- Complete items 1, 2, 3, and 4 on the reverse.
- Attach to front of article if space permits, otherwise affix to back of article.
- Endorse article "Return Receipt Requested" adjacent to number.



PENALTY FOR PRIVATE USE, \$300

RETURN TO



United States
Environmental Protection Agency
Region V
230 South Dearborn Street
Chicago, Illinois 60604

Salco Industrial Services

MI D 000 722 728

PS Form 3811, July 1983 447-845

SENDER: Complete items 1, 2, 3 and 4. 5HSJCK-13

Put your address in the "RETURN TO" space on the reverse side. Failure to do this will prevent this card from being returned to you. The return receipt fee will provide you the name of the person delivered to and the date of delivery. For additional fees the following services are available. Consult postmaster for fees and check box(es) for service(s) requested.

1. ☐ Show to whom, date and address of delivery.
2. ☐ Restricted Delivery.

3. Article Addressed to:

*Mr. Frank Fulmer
General Manager
Sales Industrial Services
304 Conant Street
Monroe, MI 48161*

4. Type of Service:

- ☐ Registered ☐ Insured
☒ Certified ☐ COD
☐ Express Mail

Article Number

P 611 589 373

Always obtain signature of addressee or agent and **DATE DELIVERED.**

5. Signature - Addressee

X Richard A. Reyes

6. Signature - Agent

X

7. Date of Delivery

12/2/85

8. Addressee's Address (ONLY if requested and fee paid)

DOMESTIC RETURN RECEIPT

We must determine whether releases of hazardous waste or hazardous waste constituents have ever occurred at the above-referenced facility site. If they have, we must ensure that corrective actions either have been taken or will be taken to eliminate threats to public health or the environment. An important element in our decision process is the information that you provide on the enclosed certification statement. Please read it carefully and either sign it and return it, or return it unsigned with a cover letter of explanation, within 45 days of the date of this letter. At some point in time, public input will be sought to either confirm or deny information you provide, or information we gather on our own, concerning releases and corrective actions.

Sincerely yours



David A. Stringham
Chief, Solid Waste Branch

Enclosure

	VP.	ADM.	L CHIEF	IL CHIEF	HL CHIEF	HL/PH CHIEF	GL CHIEF	TPS CHIEF	WWS CHIEF	WWS DIR
WET DATE	9/11-25 11-85	11-25-85			11-25-85					

Salco**INDUSTRIAL
SERVICES**704 Conant St.
Monroe, Mich. 48161**Phone (313) 243-2820
Toledo (419) 255-6463**

August 5, 1985

- - - - -

Department of Natural Resources
Hazardous Waste Division
15500 Sheldon Road
Northville, Michigan 48167

AUG 9 1985

HAZARDOUS WASTE DIV

ATTN: Larry AuBuchon

Dear Mr. AuBuchon:

This letter is to up-date you on our closure plan.

The soil from the hazardous waste storage area of drums was scraped to a depth of six (6) inches. Samples were taken from the soil removed and from the area underneath. The soil that had been removed was held on site until test results came back from Toledo Testing Labs. Mr. Dan Kaniarz of Toledo Testing called Salco on July 16th and stated test results were negative, both from soil removed and from the ground underneath.

It was stated in our closure plan that the soil removed would be disposed of, but because there were no hazardous materials found in the soil it was put back into the area it was taken from. This was okayed by James Mayka of the U. S. Environmental Protection Agency, Region 5, (telephone # 312-886-6136) when I called him to discuss the necessity of disposing of soil that was not contaminated.

We have received the test results from Toledo Testing concerning the Hazardous Waste Drum Storage Area and I have enclosed a copy for your files.

We have also discussed with Jeffrey McLeod of Toledo Testing, the sampling and testing for Hazardous contaminants in Salco's Hazardous Waste Storage Tank # 6. The sampling will be done around the end of August, with test results in 10 to 14 days.

Once that is accomplished we will have completed the closure for Hazardous Waste Storage at Salco.

Concerning the non-hazardous waste oil tank farm in bermed area, all contaminated soil has been removed and properly disposed of. The new clay to replace the oil contaminated soil will probably be delivered and spread by August 13, 1985, depending on the weather.

We will keep you posted as these events progress and will be sending a letter to your attention as soon as each is completed.

Thank You for all your help and advice.

Respectfully,

A handwritten signature in cursive script that reads "Mary Gillespie".

Mary Gillespie
Coordinator

encl:

dmg/mg



UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY
REGION 5
230 SOUTH DEARBORN ST.
CHICAGO, ILLINOIS 60604

REPLY TO ATTENTION OF:
5HW-13

JUL 2 1984

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Frank Fulner
General Manager
Salco Industrial Services
704 Conant Street
Monroe, Michigan 48161

Re: Approval of Closure Plan
Modification
Salco Industrial Services
MID 000 722 728

Dear Mr. Fulner:

The United States Environmental Protection Agency (U.S. EPA), Region V, has reviewed the closure plan submitted on March 30, 1984, entitled Closure Plan Modification: March 1984. The plan was received on April 4, 1984, and reviewed pursuant to 40 CFR 265.112; it is approved with the following modifications:

1. Section D (Decontamination And Testing Procedures) on pages 7 and 8 shall be amended to include the following activities:
 - a. After removal of the 6-inch soils layer, the 10 by 50-foot drum storage area shall be divided into four 10 by 12.5-foot cells and one surface soil sample shall be taken from the midpoint of each of the 4 cells.
 - b. The control test sample and a sample from each of the four cells shall be analyzed for:

<u>Constituent</u>	<u>Method*</u>
1,1,1-trichloroethane	8010
toluene	8020
xylene	8020
methyl ethyl ketone	8015

*Test Method for Evaluating Solid Waste, Physical/Chemical Methods, EPA Pub. SW-846, 2nd ed., July, 1982.

- c. The concentrations for the above four constituents from the control test sample shall be the "background" concentrations used to determine the extent of soils cleanup in the hazardous waste outdoor drum storage area. Each sample from the four cells must indicate concentrations for each of the four constituents equal to or less than the background concentrations for closure to be deemed complete.
 - d. If any of the samples indicates a constituent or constituents greater than background, an additional six inches of soil shall be removed from this cell or cells and properly disposed of. A soil sample shall be taken from the midpoint of each cell where a second round of soil is removed. This sample shall be analyzed for the constituents listed above and compared to background.
 - e. This process shall be repeated until background concentrations for each constituent are achieved in each cell.
2. The Section entitled Schedule For Closure shall be modified by eliminating all references to EP Leachate Test and shall refer to the four constituents and pertinent analytical methods stated above.

Pursuant to 40 CFR 265.112 and subject to these modifications, the closure plan modification is hereby approved. The time allowed for completion of closure activities is described in 40 CFR 265.113. When closure is complete, submit the certifications of closure required by 40 CFR 265.115.

If you have any questions on this matter, you may contact Mr. Timothy B. O'Mara of my staff at (312) 886-4023.

Sincerely yours,

Basil G. Constantelos, Director
Waste Management Division

cc: Alan J. Howard, MDNR

5HW-13:T'OMARA:SSMITH:6/14/84

AP 6-15-84

INITIALS	DATE	TYPIST	AUTHOR	STU #1 CHIEF	STU #2 CHIEF	STU #3 CHIEF	TPS CHIEF	WMB CHIEF	WMD CHIEF
	6-14-84	AP	TBO 6/15/84			JMB 6/18/84	WMB 6/19/84	KIK 6/21/84	SS 6/22/84

Acting
Dme 6/18/84
Fdy

Timothy O'Mara 5HW-13
P 593 668 318

RECEIPT FOR CERTIFIED MAIL

NO INSURANCE COVERAGE PROVIDED
NOT FOR INTERNATIONAL MAIL

(See Reverse)

★ U.S.G.P.O. 1983-403-517

PS Form 3800, Feb. 1982

Sent to	
Mr. Frank Fulner	
Street and No.	
704 Conant Street	
P.O., State and ZIP Code	
Monroe, Michigan 48161	
Postage	\$ 20
Certified Fee	75
Special Delivery Fee	—
Restricted Delivery Fee	—
Return Receipt Showing to whom and Date Delivered	65
Return receipt showing to whom, Date, and Address of Delivery	
TOTAL Postage and Fees	\$ 155
Postmark or Date	

UNITED STATES POSTAL SERVICE
OFFICIAL BUSINESS

SENDER INSTRUCTIONS

Print your name, address, and ZIP Code in the space below.

- Complete items 1, 2, 3, and 4 on the reverse.
- Attach to front of article if space permits, otherwise affix to back of article.
- Endorse article "Return Receipt Requested"
- adjacent to number.



PENALTY FOR PRIVATE
USE, \$300

**RETURN
TO**



Mr. Timothy B. O'Mara

(Name of Sender)

230 South Dearborn Street 5HW-13

(Street or P.O. Box)

Chicago, Illinois 60604

(City, State, and ZIP Code)

PS Form 3811, July 1982

- **SENDER:** Complete Items 1, 2, 3, and 4.
Add your address in the "RETURN TO"
space on reverse.

(CONSULT POSTMASTER FOR FEES)

1. The following service is requested (check one).

- ☐ Show to whom and date delivered \$
☒ Show to whom, date, and address of delivery .. \$
2. ☐ RESTRICTED DELIVERY \$
(The restricted delivery fee is charged in addition
to the return receipt fee.)

TOTAL \$ _____

3. ARTICLE ADDRESSED TO:

Mr. Frank Fulner
704 Conant Street
Monroe, Michigan 48161

4. TYPE OF SERVICE:

- ☐ REGISTERED ☐ INSURED
☒ CERTIFIED ☐ COD
☐ EXPRESS MAIL

ARTICLE NUMBER

P 593 668 318

(Always obtain signature of addressee or agent)

I have received the article described above.

SIGNATURE ☐ Addressee ☐ Authorized agent

SM Gillespie / Sales

5. DATE OF DELIVERY

7/5/84

POSTMARK

(may be on reverse side)

6. ADDRESSEE'S ADDRESS (Only if requested)

7. UNABLE TO DELIVER BECAUSE:

7a. EMPLOYEE'S
INITIALS

WASTE MANAGEMENT
BRANCH

RETURN RECEIPT

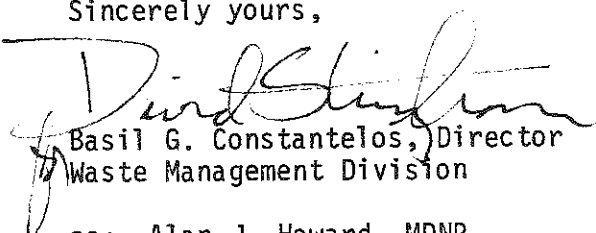
* GPO: 1982-379-593

- c. The concentrations for the above four constituents from the control test sample shall be the "background" concentrations used to determine the extent of soils cleanup in the hazardous waste outdoor drum storage area. Each sample from the four cells must indicate concentrations for each of the four constituents equal to or less than the background concentrations for closure to be deemed complete.
 - d. If any of the samples indicates a constituent or constituents greater than background, an additional six inches of soil shall be removed from this cell or cells and properly disposed of. A soil sample shall be taken from the midpoint of each cell where a second round of soil is removed. This sample shall be analyzed for the constituents listed above and compared to background.
 - e. This process shall be repeated until background concentrations for each constituent are achieved in each cell.
2. The Section entitled Schedule For Closure shall be modified by eliminating all references to EP Leachate Test and shall refer to the four constituents and pertinent analytical methods stated above.

Pursuant to 40 CFR 265.112 and subject to these modifications, the closure plan modification is hereby approved. The time allowed for completion of closure activities is described in 40 CFR 265.113. When closure is complete, submit the certifications of closure required by 40 CFR 265.115.

If you have any questions on this matter, you may contact Mr. Timothy B. O'Mara of my staff at (312) 886-4023.

Sincerely yours,


Basil G. Constantelos, Director
Waste Management Division

cc: Alan J. Howard, MDNR

STATE OF MICHIGAN



JAMES J. BLANCHARD, Governor

DEPARTMENT OF NATURAL RESOURCES

STEVENS T. MASON BUILDING
BOX 30028
LANSING, MI 48909

RONALD O. SKOOG, Director

May 25, 1984

NATURAL RESOURCES COMMISSION
THOMAS J. ANDERSON
E. R. CAROLLO
MARLENE J. FLUHARTY
STEPHEN F. MONSMA
O. STEWART MYERS
RAYMOND POUPORE
HARRY H. WHITELEY

William H. Miner, Chief
Technical, Permits and
Compliance Section, 5HW-TUB
U.S. EPA - Region V
230 South Dearborn
Chicago, Illinois 60604

Re: MID 000722728 G, TRS, TSD, PA
Salco Industrial Services

Dear Mr. Miner:

As requested by your office, enclosed closure plan comments for the
above-referenced facility.

Please call if you have questions.

Sincerely,

Peter Quackenbush, Engineer
Technical Services Section
Hazardous Waste Division

Enclosure

cc: Jodi Traub, EPA
K. Burda
L. Lodisio

RECEIVED

MAY 30 1984

WMD-RAIU
EPA, REGION V

RECEIVED
MAY 30 1984
WASTE MANAGEMENT
BRANCH

Salco Closure Plan Comments

1. The detailed procedures for taking all soil samples including equipment, sample depths, and packaging prior to transporting them for analysis must be provided to comply with 40 CFR 265.111, 112(a)(3) and 114.
2. The EP Toxic analysis is not appropriate for measuring contamination, so the soil samples must be analyzed for total metals for the following parameters: Cd, Pb, Cu, Zn, As and Cr. The soil samples must also be analyzed for all of the organics stored in the outdoor drum storage area to comply with 40 CFR 265.111, 112(a)(3) and 114.
3. The ground around tank #6 must be analyzed for contamination from constituents of the waste stored in that tank. Any contaminated soil must be removed and properly disposed of to comply with 40 CFR 265.111, 112(a)(e) and 114.
4. A revised closure cost estimate must be provided reflecting the additional work required regarding soil contamination and clean up to comply with 40 CFR 265.142.



UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY
REGION V
230 SOUTH DEARBORN ST.
CHICAGO, ILLINOIS 60604

REPLY TO ATTENTION OF:

5HW-13

MAR 1 1984

Mr. Frank Fulner
General Manager
Salco Industrial Services
704 Conant Street
Monroe, Michigan 48161

RE: Closure Plan and Surety
Bond Copy
MID000722728

Dear Mr. Fulner:

My staff has reviewed the Closure Plan and Surety Bond Copy submitted by you on November 14, 1983, for proposed closure activities at Salco Industrial Services. Pursuant to 40 CFR 265.112(d), we find your plan deficient in a number of areas. We request you modify the existing Closure Plan for Salco Industrial Services by addressing the following:

- Provide closure procedures to be implemented for the two hazardous waste drum storage facilities indicated in the Part A application for Salco pursuant to 40 CFR 265.111 and 112.
- Provide soil testing protocols to be used to determine if soil contamination exists as a result of storage activities, and the methodology to be used if removal and disposal of such soil is necessary pursuant to 40 CFR 265.111 and 114.
- Provide procedures for tank decontamination and tank residue removal activities pursuant to 40 CFR 265.112 and 197.
- Provide an estimate of the expected year of closure and a schedule for final closure pursuant to 40 CFR 265.112.
- Provide a copy of the original Surety Bond which shows that the corporation seal has been affixed at signature of the principal pursuant to 40 CFR 265.143.

Please submit the modified Closure Plan to:

RCRA Activities
U.S. EPA Region V
P.O. Box A3587
Chicago, Illinois 60960

Contact Timothy B. O'Mara, (312) 886-4023 of my staff with any questions you may have regarding this matter.

Sincerely,

Basil G. Constantelos, Director
Waste Management Division

cc: Alan Howard, MDNR

5HW-13:TO'MARA:SSMITH:2/16/84

INITIALS	DATE	TYPIST	AUTHOR	STU #1 CHIEF	STU #2 CHIEF	STU #3 CHIEF	TPS CHIEF	WMB CHIEF	WMD
	2-16-84		Wey for TBO			Wey 2/16/84	WMB 2/17/84	WMB 2/22/84	WMD 2/28 2/29/84

STATE OF MICHIGAN



NATURAL RESOURCES COMMISSION

THOMAS J. ANDERSON
J. CAROLLO
JOE A. HOEFER
STEPHEN F. MONSMA
HILARY F. SNELL
PAUL H. WENDLER
HARRY H. WHITELEY

JAMES J. BLANCHARD, Governor

DEPARTMENT OF NATURAL RESOURCES

STEVENS T. MASON BUILDING
BOX 30028
LANSING, MI 48909

RONALD O. SKOOG, Director

January 17, 1984

Mr. William H. Miner, Chief
Technical, Permits and
Compliance Section, SHW-13
U.S. EPA - Region V
230 South Dearborn
Chicago, Illinois 60604

Re: MID 000722728 G, TRS, TSD, - 9
Salco Industrial Services

Dear Mr. Miner:

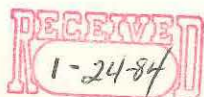
As requested by your office, enclosed are the comments on the closure plan for the above-referenced facility.

Please contact me if you have questions.

Sincerely,

Peter Quackenbush, Engineer
Technical Services Section
Hazardous Waste Division
(517) 373-2730

Enclosure



RECEIVED
JAN 23 1984

WASTE MANAGEMENT
BRANCH

Salco Industrial Services
Closure Plan Comments

1. Provide a description of procedures to decontaminate tank #6 which insure that all hazardous waste and residue is removed, and how this will be certified to comply with 40 CFR 265.112(a)(3) and 265.197.
2. Provide a closure schedule including total time required to close the facility, and the time required for individual closure activities to comply with 40 CFR 265.112(a)(4).
3. Provide that soil testing be done to determine if contamination exists and removal is required to comply with 40 CFR 265.111 and 114.
4. If drum storage of hazardous waste has taken place at this facility, then closure of that area of the facility should be included in the plan to comply with 40 CFR 265.111 and 112.

DEC 27 1983

5HW-13

Mr. Alan Howard, Chief
Technical Services Section
Hazardous Waste Division
Michigan Department of Natural
Resources
P.O. Box 30028
Lansing, MI. 48909

RE: Salco Industrial Services,
Monroe, MI. (MID000722728)
Closure Activities

Dear Mr. Howard:

The United States Environmental Protection Agency (U.S. EPA) has received a notification from the subject facility for initiation of closure proceedings for its hazardous waste storage activities.

Accordingly, pursuant to Task 2, Output 2 of the anticipated FY 1984 Cooperative Arrangement between U.S. EPA and the Michigan Department of Natural Resources, I am requesting your agency's assessment of the adequacy of this closure plan.

I have assigned Timothy B. O'Hara, (312) 886-4023, as the staff person responsible for the resolution of this plan. Please transmit your agency's comments to Mr. O'Hara by January 31, 1984.

Sincerely,

ORIGINAL SIGNED BY
WILLIAM H. MINER

William H. Miner, Chief
Technical, Permits and Compliance Section

Enclosure

5HW-13:WMUNO:SSMITH:12/21/83

bcc: J. Boyle
J. Traub

INITIALS	DATE	TYPIST	AUTHOR	STU #1 CHIEF	STU #2 CHIEF	STU #3 CHIEF	TPS CHIEF	WMB CHIEF
			TBO 12/22/83			WEH 12/22/83	WMB 12/23/83	

Salco

INDUSTRIAL
SERVICES

704 Conant St.
Monroe, Mich. 48161

Phone (313) 243-2820

Toledo (419) 255-6463

RECEIVED

MID000722728 PAG. 1, 2, 3 NOV 22 1983

November 14, 1983 WASTE MANAGEMENT BRANCH
EPA, REGION V

Mr. Joseph Boyle
Michigan State Implementation Officer
EPA Region V
RCRA Activities
PO Box A3587
Chicago IL 60690

Dear Mr. Boyle:

This letter is to notify the EPA of Salco Incorporated's intent to begin necessary "closure" proceedings on hazardous waste storage activities at our Monroe, Michigan site; on or about May 18, 1984.

We are submitting this letter, closure plan, and surety bond copy to initiate the 180-day notification period.

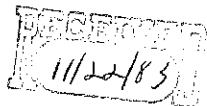
It is Salco's understanding that the EPA will approve, modify, or disapprove of the closure plan within 90 days of receipt of same.

Respectfully,

Frank Fulner
Frank Fulner
General Manager

encl: closure plan
surety bond

cc: Laura Lodisio
Earl Williams



STATUS REPORT - RCRA COMPLIANCE 7/10/83
Salco, Incorporated
Monroe, Michigan
EPA ID. No. MID000722728

SUBPART G - CLOSURE

A Closure Plan for the facility was prepared and posted on the premises on May 19, 1981. This Plan includes cost estimates for the closure requirements for the facility.

A revised copy of the Closure Plan is below. This Plan is available for inspection. It includes a schedule of closure activities.

The Plan specifies the amount of waste to be stored and the capabilities of the site for storage. It does not estimate the year the site will be closed.

CLOSURE PLAN

- Salco
704 Conant Street
Monroe, Michigan 48161
MID000722728
Supercedes Closure Plan 5/19/81

This Closure Plan is to be posted in accordance with RCRA for Salco, Incorporated dba Salco Industrial Services hazardous waste storage facility.

TYPES OF WASTES STORED TEMPORARILY

A. FLAMMABLE SOLVENTS AND PAINT WASH

These will be taken to various solvent reclamation facilities, if reclaimable; U.S. Chemical Co., Inc., Roseville, MI, Chemical Recovery Systems, Romulus, MI, or other suitable facilities.

If the waste is evaluated as economically unsuited for reclamation, it will be disposed of by incineration at a suitable facility; Ross Incineration Services, Inc., Grafton, OH, General Portland Inc., Paulding, OH.

B. PLATING WASTES, ACIDS, CAUSTICS

These types of materials will be disposed of at Nelson Industrial Services, Detroit, MI, Chem-Met Services, Wyandotte, MI, Michigan Disposal, Inc., Belleville, MI, or other suitable facilities.

C. HALOGENATED SOLVENTS

These will be taken to various solvent reclamation facilities if reclaimable; sites listed in A. above, Chemtron Corporation, Avon, OH, Chemical Solvents, Inc., Cleveland, OH, or other suitable facilities.

If the waste is evaluated as economically unsuited for reclamation, it will be disposed of by incineration at sites listed in A. above.

SALCO, INCORPORATED
704 CONANT STREET
MONROE, MICHIGAN 48161
EPA I.D. No. MID000722728

GENERAL CONDITIONS OF TEMPORARY STORAGE

- A. All drums and DOT portable containers will be labeled, and location on the site logged.
- B. In most cases, the hazardous waste will have a pre-designated disposal site.
- C. There should never be more than 150 drums, or total of 12,000 gallons (including tank #6 and any DOT portable containers being used) on the site at any one time. At most times there will be no hazardous wastes, or 20-50 drums awaiting disposal.
- D. There are bulk tanks on the property. Only one, the 3000 gallon capacity number six tank is to be used for hazardous waste storage; limited to waste flammable solvents and waste halogenated solvents. These wastes have EPA numbers F001, F002, F003, F004, and F005.

CLOSURE PROCEDURE

- A. Those wastes which have predesignated disposal sites will be transported to those sites.
- B. Those wastes which have no predesignated disposal sites will be cleared for acceptance at an appropriate disposal site, and transported to that site.
- C. Soil suspected of being contaminated will be tested if necessary, skimmed and taken to Wayne Disposal, Belleville, MI, for secure landfill.
- D. Tank number six will be cleaned out of all residue in bottom. The residue will be taken to an incineration site or to another site such as Chem-Met Services, as appropriate. Because of the limited types of wastes stored in it (F001, F002, F003, F004 and F005), decontamination will present no problems. After the residues have been thoroughly cleaned out, the tank will be used for waste oil storage.
- E. When closure is completed, the EPA Region V Administrator will be sent a copy of the plan for closure, certified by a professional engineer.

ESTIMATED CLOSURE COSTS

A. DRUMS:

Based on an average of 50 drums on site

Disposal	\$28/drum X 50 drums	\$ 1,400
Transportation	\$38/hr X 5 hrs	190
		<hr/>
		\$ 1,590

SALCO, INCORPORAT
704 CONANT STREET
MONROE, MICHIGAN 48161
EPA I.D. No. MID000722728

B. BULK:

Based on 3000 gallons in tank #6, non-reclaimable

Disposal at General Portland by incineration	
$\$0.30/\text{gal} \times 3000 \text{ gal}$	\$ 900
Transportation $\$38/\text{hr} \times 8 \text{ hrs}$	<u>304</u>
	\$ 1204

Based on 3000 gallons in tank #6, reclaimable

Disposal at U.S. Chemical	
no charge	\$ 00
Transportation $\$38/\text{hr} \times 6 \text{ hrs}$	<u>228</u>
	\$ 228

C. TANK NO. 6 RESIDUES:

Based on 100 gallons of sludge

Disposal at Chem-Met Services	
$\$0.21/\text{gal} \times 100 \text{ gal}$	\$ 21
Clean-out and transposition	
$\$38/\text{hr} \times 6 \text{ hrs}$	<u>228</u>
	\$ 249

D. CONTAMINATED SOIL:

Based on 500 sq ft 6 in deep

Disposal at Chem-Met Services	
$\$42/\text{cu yd} \times 10 \text{ yd}$	\$ 420
Skimming and transposition	
$\$39/\text{hr} \times 4 \text{ hrs}$	<u>156</u>
	\$ 576

E. ESTIMATE TOTAL COST:

Based on worst-case of each of the above

A.	\$ 1,590
B.	1,204
C.	249
D.	<u>576</u>
	\$ 3,619

SALCO, INCORPORATED)
704 CONANT STREET
MONROE, MICHIGAN 48161
EPA I.D. No. MID000722728

ADDENDUM 11/10/83 TO CLOSURE PLAN

DATE OF CLOSURE

Salco, Incorporated expects to begin closure 180 days after submission of this closure plan to the EPA Regional Administrator.

Date of submission: 11/18/83

Date of intended closure start: 5/18/84

PRESENT STATUS OF THE SITE

- A. There is no hazardous waste stored on site, nor will there be any at any future date.
- B. The last hazardous waste stored on site was 330 gallons of liquid consisting of methyl ethyl ketone and isopropyl alcohol; in hazardous waste tank #6. That material was shipped to U.S. Chemical on 6/30/83.
- C. Hazardous waste tank #6 (3000 gallon capacity) has only a few inches of sludge remaining in the bottom to be cleaned out. Based on what wastes were stored in that tank, this sludge should consist of settled paint and can-coating solids.
- D. No spills of hazardous waste have occurred on the site.

ANTICIPATED CLOSURE COSTS (refer to closure plan for break-down)

- | | |
|-----------------------------------------------------------------------------------------------------------------------------------|------------|
| A. Drums disposal | \$00.00 |
| B. Bulk waste disposal | \$00.00 |
| C. Tank #6 residues disposal | \$249.00 |
| D. Contaminated soil disposal; if deemed necessary by the DNR or EPA. | \$576.00 |
| E. Total cost | \$825.00 |
| F. Surety bond assets | \$3,619.00 |
| G. Engineer's fee for certification of closure plan compliance will be adequately covered by the anticipated surety bond surplus. | \$2794.00 |

CERTIFIED COPY OF POWER OF ATTORNEY
THE OHIO CASUALTY INSURANCE COMPANY

HOME OFFICE, HAMILTON, OHIO

No. 15-417

Know All Men by These Presents: That THE OHIO CASUALTY INSURANCE COMPANY, in pursuance of authority granted by Article VI, Section 7 of the By-Laws of said Company, does hereby nominate, constitute and appoint:

Jeffrey D. Sweeney - - - - - of Toledo, Ohio - - - - -
its true and lawful agent and attorney -in-fact, to make, execute, seal and deliver for and on its behalf as surety, and as its act and deed Any and all bonds, recognizances, stipulations or undertakings excluding, however, any bonds or undertakings guaranteeing payment of loans, notes or the interest thereon. - - - - -

And the execution of such bonds or undertakings in pursuance of these presents, shall be as binding upon said Company, as fully and amply, to all intents and purposes, as if they had been duly executed and acknowledged by the regularly elected officers of the Company at its office in Hamilton, Ohio, in their own proper persons.



In WITNESS WHEREOF, the undersigned officer of the said The Ohio Casualty Insurance Company has hereunto subscribed his name and affixed the Corporate Seal of the said The Ohio Casualty Insurance Company this 1st day of June 19 78.

(Signed) Richard T. Hoffman

Asst. Vice President

STATE OF OHIO.
COUNTY OF BUTLER

} ss.

On this 1st day of June A. D. 19 78 before

the subscriber, a Notary Public of the State of Ohio, in and for the County of Butler, duly commissioned and qualified, came Richard T. Hoffman, Asst. Vice President of THE OHIO CASUALTY INSURANCE COMPANY, to me personally known to be the individual and officer described in, and who executed the preceding instrument, and he acknowledged the execution of the same, and being by me duly sworn depose and saith, that he is the officer of the Company aforesaid, and that the seal affixed to the preceding instrument is the Corporate Seal of said Company, and the said Corporate Seal and his signature as officer were duly affixed and subscribed to the said instrument by the authority and direction of the said Corporation.



IN TESTIMONY WHEREOF, I have hereunto set my hand and affixed my Official Seal at the City of Hamilton, State of Ohio, the day and year first above written.

(Signed) Dorothy Bibee

Notary Public in and for County of Butler, State of Ohio

My Commission expires December 11, 1981.

This power of attorney is granted under and by authority of Article VI, Section 7 of the By-Laws of the Company, adopted by its directors on April 2, 1954, extracts from which read:

"ARTICLE VI"

"Section 7. Appointment of Attorney-in-Fact, etc. The chairman of the board, the president, any vice-president, the secretary or any assistant secretary shall be and is hereby vested with full power and authority to appoint attorneys-in-fact for the purpose of signing the name of the Company as surety to, and to execute, attach the corporate seal, acknowledge and deliver any and all bonds, recognizances, stipulations, undertakings or other instruments of suretyship and policies of insurance to be given in favor of any individual, firm, corporation, or the official representative thereof, or to any county or state, or any official board or boards of county or state, or the United States of America, or to any other political subdivision."

This instrument is signed and sealed by facsimile as authorized by the following Resolution adopted by the directors of the Company on May 27, 1970:

"RESOLVED that the signature of any officer of the Company authorized by Article VI Section 7 of the by-laws to appoint attorneys in fact, the signature of the Secretary or any Assistant Secretary certifying to the correctness of any copy of a power of attorney and the seal of the Company may be affixed by facsimile to any power of attorney or copy thereof issued on behalf of the Company. Such signatures and seal are hereby adopted by the Company as original signatures and seal, to be valid and binding upon the Company with the same force and effect as though manually affixed."

CERTIFICATE

I, the undersigned Assistant Secretary of The Ohio Casualty Insurance Company, do hereby certify that the foregoing power of attorney, Article VI Section 7 of the by-laws of the Company and the above Resolution of its Board of Directors are true and correct copies and are in full force and effect on this date.

IN WITNESS WHEREOF, I have hereunto set my hand and the seal of the Company this 29 day of Sept. A. D., 1983



Assistant Secretary

FINANCIAL GUARANTEE BOND

Date bond executed: September 29, 1983

Effective date: September 29, 1983

Principal: SALCO, INCORPORATED
704 Conant Street
Monroe, Michigan 48161

Type of organization: corporation

State of incorporation: Ohio

Surety: The Ohio Casualty Insurance Company
136 N. Third
Hamilton, Ohio 45025

EPA ID. No. MID000722728

Salco, Incorporated
Monroe, Michigan

Closure amount: \$3,619.00

Total Penal sum of bond: \$3,619.00

Surety's bond number: 1-113-198-9

Know All Persons By These Presents, That we, the Principal and Surety hereto are firmly bound to the U.S. Environmental Protection Agency (hereinafter called EPA), in the above penal sum for the payment of which we bind ourselves, our heirs, executors, administrators, successors, and assigns jointly and severally; provided that, where the Surety(ies) are corporations acting as co-sureties, we, the Sureties, bind ourselves in such sum "jointly and severally" only for the purpose of allowing a joint action or actions against any or all of us, and for all other purposes each Surety binds itself, jointly and severally with the Principal, for the payment of such sum only as is set forth opposite the name of such Surety, but if no limit of liability is indicated, the limit of liability shall be the full amount of the penal sum.

Whereas said Principal is required, under the Resource Conservation and Recovery Act as amended (RCRA), to have a permit or interim status in order to own or operate each hazardous waste management facility identified above, and

Whereas said principal is required to provide financial assurance for closure, or closure and post-closure care, as a condition of the permit or interim status, and

Whereas said Principal shall establish a standby trust fund as is required when a surety bond is used to provide such financial assurance;

Now, Therefore, the conditions of the obligation are such that if the Principal shall faithfully, before the beginning of final closure of each facility identified above, fund the standby trust fund in the amount identified above for the facility,

Or, if the Principal shall fund the standby trust fund in such amount within 15 days after an order to begin closure is issued by an EPA Regional Administrator or a U.S. district court or other court of competent jurisdiction,

Or, if the Principal shall provide alternate financial assurance, as specified in Subpart H of 40 CFR Parts 264 or 265, as applicable, and obtain the EPA Regional Administrator's written approval of such assurance, within 90 days after the date notice of cancellation is received by both the Principal and the EPA Regional Administrator from the Surety, then this obligation shall be null and void, otherwise it is to remain in full force and effect.

The Surety shall become liable on this bond obligation only when the Principal has failed to fulfill the conditions described above. Upon notification by an EPA Regional Administrator that the Principal has failed to perform as guaranteed by this bond, the Surety shall place funds in the amount guaranteed for the facility into the standby trust fund as directed by the EPA Regional Administrator.

The liability of the Surety shall not be discharged by any payment or succession of payments hereunder, unless and until such payment or payments shall amount in the aggregate to the penal sum of the bond, but in no event shall the obligation of the Surety hereunder exceed the amount of said penal sum.

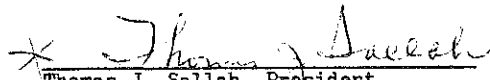
The Surety may cancel the bond by sending notice of cancellation by certified mail to the Principal and to the EPA Regional Administrator for the Region in which the facility is located, provided, however, that cancellation shall not occur during the 120 days beginning on the date of receipt of the Notice of cancellation by both the Principal and the EPA Regional Administrator, as evidenced by the return receipts.

The Principal may terminate this bond by sending written notice to the Surety, provided, however, that no such notice shall become effective until the Surety receives written authorization for termination of the bond by the EPA Regional Administrator of the EPA Region in which the bonded facility is located.

In Witness Whereof, the Principal and Surety have executed this Financial Guarantee Bond and have affixed their seals on the date set forth above.

The persons whose signatures appear below hereby certify that they are authorized to execute this surety bond on behalf of the Principal and the Surety and that the wording of this surety bond is identical to the wording specified in 40 CFR 264.151(b) as such regulations were constituted on the date this bond was executed.

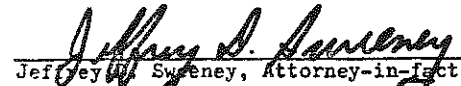
Principal: SALCO, INCORPORATED


Thomas J. Sallah, President

Corporate Surety: THE OHIO CASUALTY INSURANCE COMPANY
136 N. Third
Hamilton, Ohio 45025

State of Incorporation: Ohio

Liability limit: \$42,678,000.00


Jeffrey D. Sweeney, Attorney-in-fact

Bond Premium: \$72.00

PS Form 3817, July 1983 447-845

SENDER: Complete items 1, 2, 3 and 4 **SHS-JCK-13**

Put your address in the "RETURN TO" space on the reverse side. Failure to do this will prevent this card from being returned to you. The return receipt fee will provide you the name of the person delivered to and the date of delivery. For additional fees the following services are available. Consult postmaster for fees and check box(es) for service(s) requested.

1. ☐ Show to whom, date and address of delivery.
 2. ☐ Restricted Delivery.

3. Article Addressed to:
 Mr. Frank Fulmer, Manager
 Salco Industrial Services
 704 Conant St
 Monroe, Mi 60604

4. Type of Service: Article Number
☐ Registered ☐ Insured
☒ Certified ☐ COD P611589411
☐ Express Mail

Always obtain signature of addressee or agent and **DATE DELIVERED.**

5. Signature - Addressee
 X *W. H. Myers*

6. Signature - Agent
 X

7. Date of Delivery
5/8/86

8. Addressee's Address (ONLY if requested and fee paid)

DOMESTIC RETURN RECEIPT

PS Form 3800, Feb. 1982

* U.S.G.P.O. 1983-403-517

Sent to *Frank Fulmer*
 Street and No. *704 Conant St*
 P.O. State and ZIP Code *Monroe, Mi 60604*

Postage *\$ 73*
 Certified Fee *\$ 05*
 Special Delivery Fee *\$ 05*
 Restricted Delivery Fee *\$ 05*
 Return Receipt Showing to whom and Date Delivered *70*
 Return receipt showing to whom, date, and address of delivery *70*
 TOTAL Postage and Fees *\$ 2.18*

Postmark or Date *MAY 05 1986*

RECEIVED
U.S. POSTAL SERVICE
MONROE, MI 48166

(See Reverse)

NO INSURANCE COVERAGE PROVIDED
 NOT FOR INTERNATIONAL MAIL

SHS-JCK-13
 SWB:TPS:MI Unit
 P 611 589 411
 Carol W.itt

01 MAY 1986

5HS-13-JCK

CERTIFIED MAIL

RETURN RECEIPT REQUESTED

Mr. Frank Fulner
General Manager
Salco Industrial Services
704 Conant Street
Monroe, MI 60604

RE: Closure Certification
Salco Industrial Services
Monroe, MI
MID 000 722 728

Dear Mr. Fulner:

We have reviewed your October 21, 1985 closure certification for the container and tank storage areas at the referenced facility and have found it incomplete. As per 40 CFR 265.115 when closure is complete the owner or operator must submit to the Regional Administrator certification both by the owner or operator and by an independent registered professional engineer, that the facility has been closed in accordance with the specifications in the approved closure plan. We have not received a certification statement from the owner or operator. Please submit two copies of the certification to this office within 30 days of the date of this letter.

During our review of the closure activities at the site we found documentation that releases of hazardous waste or hazard constituents have occurred around Tank #6. Therefore, you must submit a plan for determining the nature and extent of the soil and possible groundwater contamination and take appropriate corrective action. You must follow the criteria set in the Michigan Department of Natural Resources', "How Clean Is Clean?", guidance (Attachment 1). Please submit two copies of this plan to this office by June 20, 1986.

If you have any questions regarding this matter, please contact Carol Witt of my staff at (312) 886-6146 or Pete Quackenbush of the MDNR at (517) 373-2730, for assistance.

Sincerely,

Y. J. Kim, Acting Chief
Technical Programs Section

Attachment

cc: Alan Howard, MDNR
Bill Muno, HEB

5HS-13:SWB:TPS:MI:C.WITT:J.DAVIS:DRAFT 4/10
DISK 11

4/29/86

	TYP.	AUTH.	IL. CHIEF	IN. CHIEF	ML. CHIEF	MN/WI CHIEF	OH. CHIEF	TPS CHIEF	SWB CHIEF	WIT
INIT. DATE	4/29/86	4/29/86 JCW			4/29/86 JCW			4/29/86 JCW		

Salco

INDUSTRIAL
SERVICES

704 Conant St.
Monroe, Mich. 48161

Phone (313) 243-2820

Toledo (419) 255-6463

March 30, 1984

RCRA Activities
U.S. EPA Region V
P.O. Box A3587
Chicago, Illinois 60960

MID000 722728 G, TRS, TSD, PA

Attention: 5HW-13

In compliance with the March 1, 1984 letter to Salco Industrial Services from Basil G. Constantelos, Director, Waste Management Division, enclosed is the modification to Salco's Closure Plan of November 14, 1983.

This Closure Plan Modification is identified as

CLOSURE PLAN MODIFICATION: MARCH 1984
Salco, Incorporated
Monroe, Michigan
MID000722728

and is an addendum
addressing the cited deficiencies of the 11/14/83 Closure Plan.

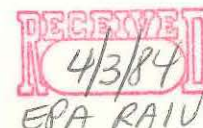
Also enclosed is an originally-signed and emboss-sealed copy of Salco's Surety Bond.

Respectfully,

Frank Fulner
Frank Fulner
General Manager

encl:

cc: Laura L. Lodisio, Michigan DNR
Earl Williams



CLOSURE PLAN MODIFICATION: MARCH 1984
Salco, Incorporated
Monroe, Michigan
MID000722728
Page 1

GENERAL INFORMATION

This Closure Plan Modification addresses deficiencies in Salco's submitted Closure Plan dated 11/14/83, as specified in the 3/1/84 letter from Director, Waste Management Division, USEPA Region V to Frank Fulner, General Manager, Salco Industrial Services.

Enclosed with the copy of this Closure Plan Modification being sent to USEPA Region V / 5HW-13 is a copy of the Surety Bond affixed with the original signatures of the Principal and the Insuring Company's Attorney-in-Fact, and the embossed seal of the Insurance Company.

Copies of this Closure Plan Modification are being sent to

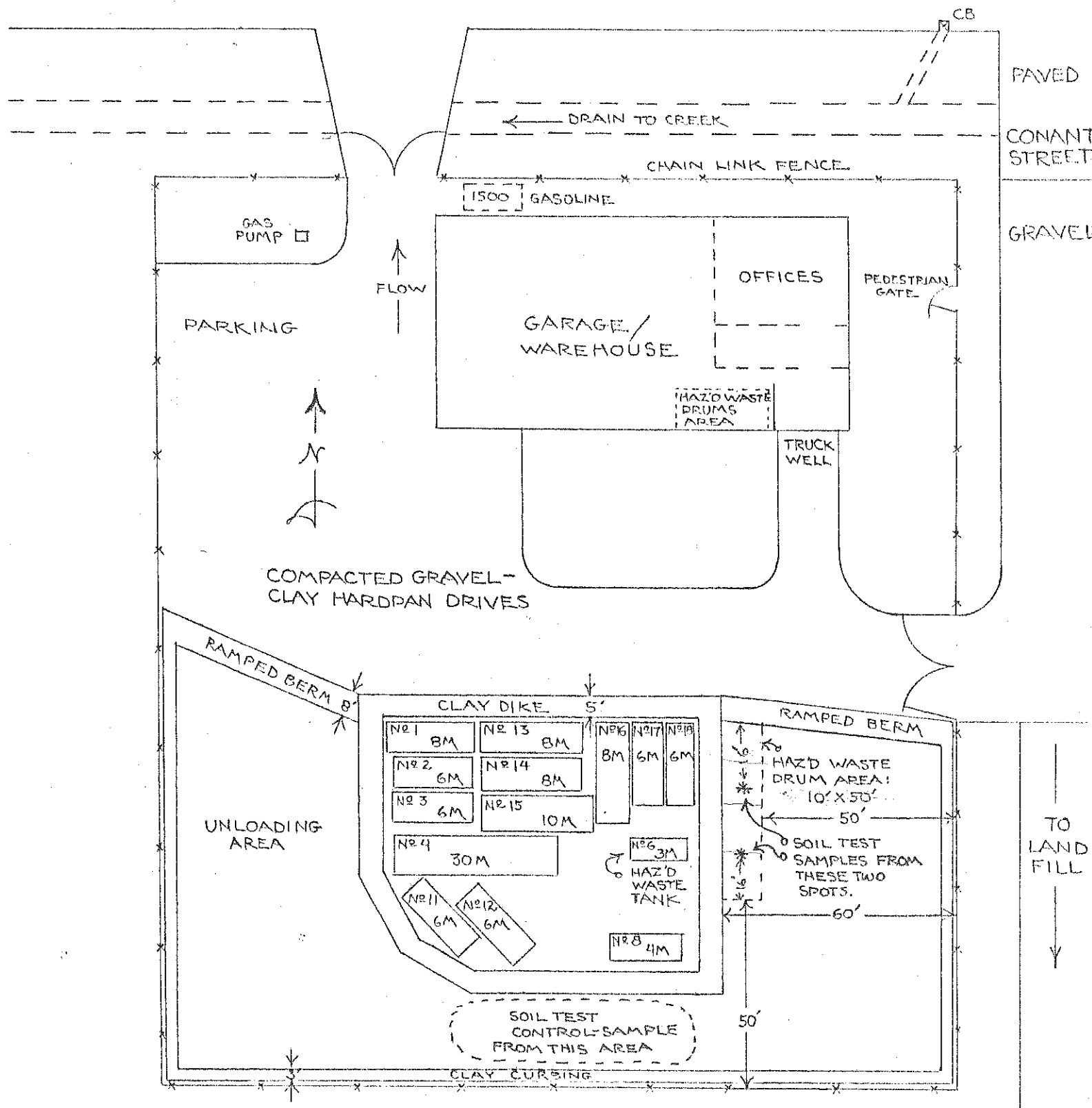
1. USEPA Region V / 5HW-13
2. Laura L. Lodisio, Michigan DNR
3. Earl Williams

This Closure Plan Modification contains 10 pages:

General Information	Page 1
Site Diagram	Page 2
Expected Year of Closure	Page 3
Schedule for Closure	Pages 3, 4
Hazardous Waste Drum Storage Area: Indoors	Pages 4, 5
Hazardous Waste Drum Storage Area: Outdoors	Pages 6, 7, 8
Hazardous Waste Storage Tank #6	Pages 8, 9, 10

SITE DIAGRAM

WOOD STREET (CONCRETE PAVE)



EXPECTED YEAR OF CLOSURE

Salco, at this time, foresees no problems with completing Closure Activities within the 90 days time allowed for Closure after receiving the final Approved Closure Plan.

Assuming the USEPA Regional Administrator's decision on a final Approved Closure Plan is given to Salco 60 days after this Closure Plan Modification is received, Closure Activities should be completed on or before August 31, 1984.

SCHEDULE FOR CLOSURE

- 1) Within two weeks of receipt of the final Approved Closure Plan from the USEPA Regional Administrator, Salco will scrape the top 6 inches of soil from the outdoor hazardous waste drum storage area and transport it to a disposal site; as described in paragraph D.1., page 7. Immediately after scraping, two soil samples of the storage area and a soil-test control sample will be taken at points specified on the site diagram, page 2, and described in paragraph D.2., page 7. This two week span is allotted to allow for possible adverse weather conditions interfering with this type of outdoor work.
- 2) The soil samples will be taken, within two days, to B.E.C. Labs in Toledo, Ohio for EP Leachate testing, as specified in paragraph D.3., page 8. The test results should be known in about a week.
- 3) The total elapsed time for scraping, disposal, sampling and testing should be three weeks, at the outside.
- 4) If the EP Leachate tests show residual contamination of the storage area, then the sequence will be repeated as specified in paragraph D.4., page 8. This could result in a total time of six weeks spent, at the outside.
- 5) When decontamination of the drum area is complete, the residual sludge heel in tank #6 will be pumped out, the tank decontaminated by steam/detergent cleaning, and the residues & rinsate all disposed of; as described in paragraphs D.2.a., b. and c., page 9. This clean-out, decontamination and disposal will be completed within one week after completion of work on the outdoor drum area described above.
- 6) As soon as Salco has received the USEPA Regional Administrator's final Approved Closure Plan, we will start work on getting an independent registered professional engineer lined up and ready

for the final Closure inspection. Therefore, one will be ready, and on call, when the final work is completed on the tank #6 decontamination. Allowing two weeks leeway for the engineer's own work schedule, the inspection should be complete within two to three weeks of the tank #6 decontamination.

- 7) Barring any unusual problems, which are not anticipated, an outside time schedule for completion of Closure Activities based on the above described time allowances will be ten weeks from the time of Salco's receipt of the final Approved Closure Plan. This will be well within the 90 days allowed by 40 CFR 265.113.

HAZARDOUS WASTE DRUM STORAGE AREA: INDOORS

- A. The storage area has a solid concrete floor, with no drains, measures 8 feet X 20 feet, located along the south-east wall of Salco's concrete block walled garage/warehouse. See Site Diagram, page 2.

B. HISTORY OF HAZARDOUS WASTE DRUM STORAGE

WASTE MATERIAL	No OF DRUMS	DATE		GENERATOR
		IN	OUT	
1. Chrome & Caustic sludge	11	7/25/80	8/5/80	Gould
2. Caustic	12	7/25/80	8/5/80	Gould
3. Spent Phosphoric Acid with Chrome	4	8/21/80	9/12/80	Ransom & Randolph
4. 1,1,1-Trichlorethane	1	12/18/80	6/24/81	Gould
5. Sludge containing 6-10% Chrome	22	4/2/81	5/13/81	Gould
6. Caustic	6	4/2/81	5/13/81	Gould
7. Waste Chromic Acid Sol'n	3	9/28/81	11/23/81	Gould
8. Sodium Hydroxide Sol'n	3	11/20/81	12/10/81	Imperial Clevite
9. Chromic Acid Solution	3	11/20/81	12/10/81	Imperial Clevite
10. Plastic Pipe Sections Contaminated with Chromic Acid Sludge Solids	1	5/9/83	6/22/83	Libbey Glass Div of O-I

SUMMARY: 1980 28 drums stored
 1981 38 drums stored
 1982 0 drums stored
 1983 1 drum stored

CLOSURE PLAN MODIFICATION: MARCH 1984

Salco, Incorporated

Monroe, Michigan

MID000722728

Page 5

C. HISTORY OF SPILLS/LEAKS FROM STORED DRUMS

All drums were inspected when brought into the facility, daily during storage, and when removed for shipment to disposal sites. All drums were found to be DOT roadworthy, with no leaks or spills observed during transit or storage. No floor stains, puddles, or other indications of any "hidden" leakage were noted on the floor storage area when stored drums were removed. Therefore, Salco concludes that no contamination of the storage area has occurred from any of the above listed stored materials.

D. DECONTAMINATION PROCEDURES

If spillage/contamination had occurred, the following clean-up procedures, based on drum contents, would have been carried out at the time the contamination was detected.

- a. Immediately transfer waste material from faulty drum to properly certified DOT roadworthy drum.
- b. Take up spilled liquid with inert non-combustible absorbent "floor dry", and shovel into a DOT roadworthy metal open top drum for proper disposal at a licensed hazardous waste disposal facility.
- c. If decontamination of the floor is deemed necessary because of hexavalent chrome leakage, clean-up to be effected with aqueous ferrous sulfate/ H_2SO_4 at pH 2.5-3.0, to convert the hexavalent chrome to the trivalent state. After conversion, the acid wash is to be neutralized with soda ash, diluted & rinsed down with water, and the liquid taken up with inert "floor dry". The contaminated "floor dry" will be shoveled into the drums with the hexavalent contaminated "floor dry" for disposal. The disposal site for the chrome contaminated clean-up materials is Wayne Disposal, Inc., Belleville, Michigan.
- d. Clean-up of leakage/spillage from the other stored wastes will be effected by absorption with inert "floor dry", shoveling into DOT roadworthy open top drums, rinsing the area with water/detergent, taking up with "floor dry", and drumming with the absorbed spill material. Disposal of the material is at Wayne Disposal, Inc., or at Chem-Met Services, Wyandotte, Michigan.

E. PRESENT STATUS OF THE HAZARDOUS WASTE DRUM STORAGE AREA

The last drum of waste was removed on 6/22/83. Hazardous waste is no longer stored at Salco's facility. The former storage-area floor space is now used for general storage of garage equipment, truck tires, hydraulic oil drums, etc.

HAZARDOUS WASTE DRUM STORAGE AREA: OUTDOORS

A. HISTORY OF HAZARDOUS WASTE DRUM STORAGE

WASTE MATERIAL	NO OF DRUMS	DATE		GENERATOR
		IN	OUT	
1. Carbon Black, Xylene, MEK, 1,1,1-Trichloroethane	13	9/19/80	10/31/80	Gould
2. Same as 1. above.	30	2/24/81	3/16/81	Gould
3. Mixed: Ethanol, Methanol, MEK, Toluene, Xylene	72	3/26/81	4/8/81	Kaiser Aluminum
4. Toluene, Epoxy, Paint Solids	4	4/20/81	5/13/81	U.S. Gypsum
5. Methylene Chloride, Petroleum Distillate	2 X 300 gal TANK	5/5/81	5/13/81	Champion Sparkplug
6. Waste Residues from Indust Painting, Ethanol, Xylene, Toluene, Methanol, MEK	73	6/5/81	8/3/81	Kaiser Aluminum
7. Wash-up Solvent: IPAlc, MEK, Water, Oil	34	6/22/81	10/13/81	Stroh's Container
8. Iron Oxide Baghouse Dust D006, D008, 003D	metal bin		7/17/81	North Star Steel
9. Xylene, BuAcetate, Alcohol, Cellosolve Acetate, Resins	300 gal tank	7/27/81	9/17/81	Abitibi
10. MEK, MIBK, BuCellosolve, Toluene, Alkyd Resin	12	8/24/81	9/8/81	Prefinish Metals
11. MEK, MIBK, BuCellosolve, Toluene, Alkyd Resin	20	9/9/81	9/16/81	Prefinish Metals
12. Wash-up Solvent: IPAlc, MEK, Water, Oil	19	11/3/81	11/18/81	Stroh's Container
13. Chlorinated Rubber Cement, Xylene, MEK	11	11/20/81	12/8/81	Imperial Clevite
14. Ink Formulation Wash Solv.	2	10/12/81	12/8/81	Sinclair Valentine
15. Xylene, BuAcetate, Alcohol, CelloAcetate, D008, 001D	53	12/15/81	1/6/82	Abitibi
16. { "Top Coat" mixed w/ Dirt } { 10		12/11/81	4/19/82	Abitibi
17. { & Sand, partial catalyzed } { 13		12/15/81	4/19/82	Abitibi
18. { Pure Top Coat, Lacquers, } { 10		12/15/81	4/19/82	Abitibi
18. { Inks, D008, 001D }				
19. MEK	4	2/21/83	4/21/83	Stroh's Container
20. IPAlcohol, Water, Oil	2	2/21/83	4/21/83	Stroh's Container

A. HISTORY OF HAZARDOUS WASTE DRUM STORAGE (ct'd)

SUMMARY: 1980	13 drums stored
1981	363 drums, 3 300-gallon portable tote tanks, 1 dust bin stored
1982	86 drums stored, all carried over from 1981
1983	6 drums stored

B. The 10' X 50' outdoor drum storage area is located within the south-east bermed/curbed yard area, and along the east edge of the waste oil tank-farm containment dike. The south and east boundaries of the drum storage area are 50 feet from the south and east fenced property lines, respectively. See Site Diagram, page 2.

C. HISTORY OF SPILLS/LEAKS FROM STORED WASTES

All drums were inspected when brought into the facility, daily during storage, and when removed for shipment to disposal sites. All drums were found to be DOT roadworthy, with no leaks or spills observed during transit or storage. The 300-gallon portable tanks (totes) used for storage were bought new by Salco, and certified DOT roadworthy by the manufacturer. No spillage or leakage was observed during waste handling or storage with these totes. Fugitive dust during handling of the baghouse material was minimized by careful transfer techniques, and eliminated during storage by use of tarpaulin covering.

D. DECONTAMINATION AND TESTING PROCEDURES

1. The top 6-inch layer of soil will be scraped from the surface of the 10' X 50' drum storage area (approximately 9½ cubic yards), and transported in bulk to a Michigan DNR licensed hazardous waste landfill; Wayne Disposal Inc., Belleville, MI. It will be classified and manifested as hazardous by virtue of possibly containing contaminants from stored wastes; D006, D008 and 001D. Any stored solvents which may have leaked unnoticed would have long since evaporated.
2. After scraping and disposal of the 6-inch soil layer, two ground soil samples will be taken for EP Leachate testing for heavy metals. The samples will be taken at points along the north/south centerline of the 10' X 50' area; one sample 16 feet south of the north edge, and the other sample 16 feet north of the south edge (see Site Diagram, page 2). A control test sample will be taken of the soil at a place in the bermed/curbed drive-around area between the south containment

dike and south property line, approximately midway between the east and west property lines. See Site Diagram, page 2.

3. The soil samples will be submitted to Biological & Environmental Control Labs, Inc., Toledo, Ohio, for EP Leachate testing for D006, D008, 001D and 003D; the last two, copper and zinc, being classified hazardous by the Michigan DNR.
4. In the event the EP Leachate testing of the soil samples indicates higher than acceptable metal levels, a second soil scraping, disposal, testing sequence will be carried out. However, it is expected that the initial testing will show this to be unnecessary, since the first 6-inch scraping will go several inches into the 2-foot thick clay cap upon which Salco's yard is located.

E. PRESENT STATUS OF THE OUTDOOR HAZARDOUS WASTE DRUM STORAGE AREA

The last drum of waste was removed from this storage area on 4/21/83. Hazardous waste is not now, nor will be in the future, stored at Salco's facility. This 10' X 50' area is now just a general yard area, kept clear for access to the dike.

HAZARDOUS WASTE STORAGE TANK #6

A. HISTORY OF HAZARDOUS WASTE STORAGE

	WASTE MATERIAL	GALLONS	DATE		GENERATOR
			IN	OUT	
1.	98+% MEK, Hexane, Toluene, Paint.	3000	8/17/81	9/21/81	Ball Metal Container
2.	Total Metals: Zn + Ti + Mn + Fe + Pb + Cr + Cu ≅	1000	3/5/82	3/18/82	Ball Metal Container
3.	220 ppm as Pb.	3000	4/23/82	5/11/82	Ball Metal Container
4.	Wash-up Solvent: IPA, Alcohol, MEK, Oil, Water	330	5/31/83	6/30/83	Stroh's Container

- B. The hazardous waste storage tank is a 3000-gallon horizontal carbon steel tank measuring 5-feet in diameter by 20-feet long. It is located within the diked waste oil storage tank farm, just inside the east dike edge. See Site Diagram, page 2.

C. HISTORY OF SPILLS/LEAKS FROM TANK #6

No spills occurred during transfer, by hose, into and out of the tank. During routine daily inspections of the hazardous waste storage areas, no leakage from the tank was observed. Tank #6 has no bottom valves, drains, or other bottom-access openings. All access is from the top of the tank.

D. DECONTAMINATION AND TESTING

1. The ground around the tank:

- a. Any attempt to analyze the soil for possible parts-per-million metals contamination from tank #6 contents would be frustrated because of the ever present gross contamination from waste oil residues; these residues being all manner of sediments, dirt, and contaminants typically found in automobile & truck crankcase oils, ocean-going & Great Lakes steamship oils, factory oils, railroad repair yard oils, etc.
- b. The ground area within the diked area is periodically contaminated by occasional spillage from waste oil transfer activities. This requires subsequent clean-up and disposal of the spillage and some surface soil. As a result, if any small unobserved contamination were to have occurred from tank #6 contents, it would have long since been cleaned up along with the waste oil spillage.

2. The storage tank:

- a. Tank #6 presently contains a few inches of sludge heel (settled paint, sediment, liquid) remaining from the waste storage activities listed in A., page 8. This heel will be cleaned out of the tank using Salco's vacuum pump tank truck; which is DNR licensed for hazardous waste handling.
- b. Tank #6 will then be decontaminated by clean-out using Salco's steam jenny, equipped with steam-cleaning detergent compound feeder.
- c. The sludge heel and steam-cleaning rinsate will be combined and disposed of at a licensed hazardous waste disposal facility where it will be stabilized and then landfilled; Michigan Disposal/Wayne Disposal, Belleville, Michigan.
- d. The cleaned/decontaminated tank will be put into service as a waste oil storage tank; after Closure Activities have been completed and approved.

CLOSURE PLAN MODIFICATION: MARCH 1984
Salco, Incorporated
Monroe, Michigan
MID000722728
Page 10

E. PRESENT STATUS OF TANK #6

The last stored waste was removed from the tank and transported to a solvent reclamation facility on 6/30/83.

Hazardous waste is not now, nor will be in the future, stored at Salco's facility. Tank #6 will remain out of service until it has been cleaned & decontaminated, and inspected & certified by an independent registered professional engineer, in compliance with facility Closure Regulations 40 CFR 265.115.

FINANCIAL GUARANTEE BOND

Date bond executed: September 29, 1983

Effective date: September 29, 1983

Principal: SALCO, INCORPORATED
704 Conant Street
Monroe, Michigan 48161

Type of organization: corporation

State of incorporation: Ohio

Surety: The Ohio Casualty Insurance Company
136 N. Third
Hamilton, Ohio 45025

EPA ID. No. MID000722728

Salco, Incorporated
Monroe, Michigan

Closure amount: \$3,619.00

Total Penal sum of bond: \$3,619.00

Surety's bond number: 1-113-198-9

Know All Persons By These Presents, That we, the Principal and Surety hereto are firmly bound to the U.S. Environmental Protection Agency (hereinafter called EPA), in the above penal sum for the payment of which we bind ourselves, our heirs, executors, administrators, successors, and assigns jointly and severally; provided that, where the Surety(ies) are corporations acting as co-sureties, we, the Sureties, bind ourselves in such sum "jointly and severally" only for the purpose of allowing a joint action or actions against any or all of us, and for all other purposes each Surety binds itself, jointly and severally with the Principal, for the payment of such sum only as is set forth opposite the name of such Surety, but if no limit of liability is indicated, the limit of liability shall be the full amount of the penal sum.

Whereas said Principal is required, under the Resource Conservation and Recovery Act as amended (RCRA), to have a permit or interim status in order to own or operate each hazardous waste management facility identified above, and

Whereas said principal is required to provide financial assurance for closure, or closure and post-closure care, as a condition of the permit or interim status, and

Whereas said Principal shall establish a standby trust fund as is required when a surety bond is used to provide such financial assurance;

Now, Therefore, the conditions of the obligation are such that if the Principal shall faithfully, before the beginning of final closure of each facility identified above, fund the standby trust fund in the amount identified above for the facility,

Or, if the Principal shall fund the standby trust fund in such amount within 15 days after an order to begin closure is issued by an EPA Regional Administrator or a U.S. district court or other court of competent jurisdiction,

Or, if the Principal shall provide alternate financial assurance, as specified in Subpart H of 40 CFR Parts 264 or 265, as applicable, and obtain the EPA Regional Administrator's written approval of such assurance, within 90 days after the date notice of cancellation is received by both the Principal and the EPA Regional Administrator from the Surety, then this obligation shall be null and void, otherwise it is to remain in full force and effect.

The Surety shall become liable on this bond obligation only when the Principal has failed to fulfill the conditions described above. Upon notification by an EPA Regional Administrator that the Principal has failed to perform as guaranteed by this bond, the Surety shall place funds in the amount guaranteed for the facility into the standby trust fund as directed by the EPA Regional Administrator.

The liability of the Surety shall not be discharged by any payment or succession of payments hereunder, unless and until such payment or payments shall amount in the aggregate to the penal sum of the bond, but in no event shall the obligation of the Surety hereunder exceed the amount of said penal sum.

The Surety may cancel the bond by sending notice of cancellation by certified mail to the Principal and to the EPA Regional Administrator for the Region in which the facility is located, provided, however, that cancellation shall not occur during the 120 days beginning on the date of receipt of the Notice of cancellation by both the Principal and the EPA Regional Administrator, as evidenced by the return receipts.

The Principal may terminate this bond by sending written notice to the Surety, provided, however, that no such notice shall become effective until the Surety receives written authorization for termination of the bond by the EPA Regional Administrator of the EPA Region in which the bonded facility is located.

In Witness Whereof, the Principal and Surety have executed this Financial Guarantee Bond and have affixed their seals on the date set forth above.

The persons whose signatures appear below hereby certify that they are authorized to execute this surety bond on behalf of the Principal and the Surety and that the wording of this surety bond is identical to the wording specified in 40 CFR 264.151(b) as such regulations were constituted on the date this bond was executed.

Principal: SALCO, INCORPORATED

* Thomas J. Sallah
Thomas J. Sallah, President

Corporate Surety: THE OHIO CASUALTY INSURANCE COMPANY
136 N. Third
Hamilton, Ohio 45025

State of Incorporation: Ohio

Liability limit: \$42,678,000.00

Jeffrey D. Sweeney
Jeffrey D. Sweeney, Attorney-in-fact

Bond Premium: \$72.00

CERTIFIED COPY OF POWER OF A. TORNEY
THE OHIO CASUALTY INSURANCE COMPANY

HOME OFFICE, HAMILTON, OHIO

No. 15-417

Known All Men by These Presents: That THE OHIO CASUALTY INSURANCE COMPANY, in pursuance of authority granted by Article VI, Section 7 of the By-Laws of said Company, does hereby nominate, constitute and appoint:

Jeffrey D. Sweeney - - - - - of Toledo, Ohio - - - - -
its true and lawful agent and attorney -in-fact, to make, execute, seal and deliver for and on its behalf as surety, and as its act and deed Any and all bonds, recognizances, stipulations or undertakings excluding, however, any bonds or undertakings guaranteeing payment of loans, notes or the interest thereon. - - - - -

And the execution of such bonds or undertakings in pursuance of these presents, shall be as binding upon said Company, as fully and amply, to all intents and purposes, as if they had been duly executed and acknowledged by the regularly elected officers of the Company at its office in Hamilton, Ohio, in their own proper persons.



In WITNESS WHEREOF, the undersigned officer of the said The Ohio Casualty Insurance Company has hereunto subscribed his name and affixed the Corporate Seal of the said The Ohio Casualty Insurance Company this 1st day of June 19 78.

(Signed) Richard T. Hoffman

Asst. Vice President

STATE OF OHIO,
COUNTY OF BUTLER

} SS.

On this 1st day of June A. D. 19 78 before

the subscriber, a Notary Public of the State of Ohio, in and for the County of Butler, duly commissioned and qualified, came Richard T. Hoffman, Asst. Vice President of THE OHIO CASUALTY INSURANCE COMPANY, to me personally known to be the individual and officer described in, and who executed the preceding instrument, and he acknowledged the execution of the same, and being by me duly sworn deposeth and saith, that he is the officer of the Company aforesaid, and that the seal affixed to the preceding instrument is the Corporate Seal of said Company, and the said Corporate Seal and his signature as officer were duly affixed and subscribed to the said instrument by the authority and direction of the said Corporation.



IN TESTIMONY WHEREOF, I have hereunto set my hand and affixed my Official Seal at the City of Hamilton, State of Ohio, the day and year first above written.

(Signed) Dorothy Bibee

Notary Public in and for County of Butler, State of Ohio

My Commission expires December 11, 1981.

This power of attorney is granted under and by authority of Article VI, Section 7 of the By-Laws of the Company, adopted by its directors on April 2, 1954, extracts from which read:

"ARTICLE VI"

"Section 7. Appointment of Attorney-in-Fact, etc. The chairman of the board, the president, any vice-president, the secretary or any assistant secretary shall be and is hereby vested with full power and authority to appoint attorneys-in-fact for the purpose of signing the name of the Company as surety to, and to execute, attach the corporate seal, acknowledge and deliver any and all bonds, recognizances, stipulations, undertakings or other instruments of suretyship and policies of insurance to be given in favor of any individual, firm, corporation, or the official representative thereof, or to any county or state, or any official board or boards of county or state, or the United States of America, or to any other political subdivision."

This instrument is signed and sealed by facsimile as authorized by the following Resolution adopted by the directors of the Company on May 27, 1970:

"RESOLVED that the signature of any officer of the Company authorized by Article VI Section 7 of the by-laws to appoint attorneys in fact, the signature of the Secretary or any Assistant Secretary certifying to the correctness of any copy of a power of attorney and the seal of the Company may be affixed by facsimile to any power of attorney or copy thereof issued on behalf of the Company. Such signatures and seal are hereby adopted by the Company as original signatures and seal, to be valid and binding upon the Company with the same force and effect as though manually affixed."

CERTIFICATE

I, the undersigned Assistant Secretary of The Ohio Casualty Insurance Company, do hereby certify that the foregoing power of attorney, Article VI Section 7 of the by-laws of the Company and the above Resolution of its Board of Directors are true and correct copies and are in full force and effect on this date.

IN WITNESS WHEREOF, I have hereunto set my hand and the seal of the Company this 29 day of Sept. A. D., 19 83



Assistant Secretary

STATUS REPORT - RCRA COMPLIANCE 7/10/83
Salco, Incorporated
Monroe, Michigan
EPA ID, No. MID000722728

SUBPART G - CLOSURE

A Closure Plan for the facility was prepared and posted on the premises on May 19, 1981. This Plan includes cost estimates for the closure requirements for the facility.

A revised copy of the Closure Plan is below. This Plan is available for inspection. It includes a schedule of closure activities.

The Plan specifies the amount of waste to be stored and the capabilities of the site for storage. It does not estimate the year the site will be closed.

CLOSURE PLAN

- Salco
704 Conant Street
Monroe, Michigan 48161
MID000722728
Supercedes Closure Plan 5/19/81

This Closure Plan is to be posted in accordance with RCRA for Salco, Incorporated dba Salco Industrial Services hazardous waste storage facility.

TYPES OF WASTES STORED TEMPORARILY

A. FLAMMABLE SOLVENTS AND PAINT WASH

These will be taken to various solvent reclamation facilities, if reclaimable; U.S. Chemical Co., Inc., Roseville, MI, Chemical Recovery Systems, Romulus, MI, or other suitable facilities.

If the waste is evaluated as economically unsuited for reclamation, it will be disposed of by incineration at a suitable facility; Ross Incineration Services, Inc., Grafton, OH, General Portland Inc., Paulding, OH.

B. PLATING WASTES, ACIDS, CAUSTICS

These types of materials will be disposed of at Nelson Industrial Services, Detroit, MI, Chem-Met Services, Wyandotte, MI, Michigan Disposal, Inc., Belleville, MI, or other suitable facilities.

C. HALOGENATED SOLVENTS

These will be taken to various solvent reclamation facilities if reclaimable; sites listed in A. above, Chemtron Corporation, Avon, OH, Chemical Solvents, Inc., Cleveland, OH, or other suitable facilities.

If the waste is evaluated as economically unsuited for reclamation, it will be disposed of by incineration at sites listed in A. above.

SALCO, INCORPORATED
704 CONANT STREET
MONROE, MICHIGAN 48161
EPA I.D. No. MID000722728

GENERAL CONDITIONS OF TEMPORARY STORAGE

- A. All drums and DOT portable containers will be labeled, and location on the site logged.
- B. In most cases, the hazardous waste will have a pre-designated disposal site.
- C. There should never be more than 150 drums, or total of 12,000 gallons (including tank #6 and any DOT portable containers being used) on the site at any one time. At most times there will be no hazardous wastes, or 20-50 drums awaiting disposal.
- D. There are bulk tanks on the property. Only one, the 3000 gallon capacity number six tank is to be used for hazardous waste storage; limited to waste flammable solvents and waste halogenated solvents. These wastes have EPA numbers F001, F002, F003, F004, and F005.

CLOSURE PROCEDURE

- A. Those wastes which have predesignated disposal sites will be transported to those sites.
- B. Those wastes which have no predesignated disposal sites will be cleared for acceptance at an appropriate disposal site, and transported to that site.
- C. Soil suspected of being contaminated will be tested if necessary, skimmed and taken to Wayne Disposal, Belleville, MI, for secure landfill.
- D. Tank number six will be cleaned out of all residue in bottom. The residue will be taken to an incineration site or to another site such as Chem-Met Services, as appropriate. Because of the limited types of wastes stored in it (F001, F002, F003, F004 and F005), decontamination will present no problems. After the residues have been thoroughly cleaned out, the tank will be used for waste oil storage.
- E. When closure is completed, the EPA Region V Administrator will be sent a copy of the plan for closure, certified by a professional engineer.

ESTIMATED CLOSURE COSTS

A. DRUMS:

Based on an average of 50 drums on site

Disposal	\$28/drum X 50 drums	\$ 1,400
Transportation	\$38/hr X 5 hrs	190
		<hr/>
		\$ 1,590

SALCO, INCORPORATED
204 CONANT STREET
MONROE, MICHIGAN 48161
EPA I.D. No. MID000722728

B. BULK:

Based on 3000 gallons in tank #6, non-reclaimable

Disposal at General Portland by incineration	
$\$0.30/\text{gal} \times 3000 \text{ gal}$	\$ 900
Transportation $\$38/\text{hr} \times 8 \text{ hrs}$	<u>304</u>
	\$ 1204

Based on 3000 gallons in tank #6, reclaimable

Disposal at U.S. Chemical	
no charge	\$ 00
Transportation $\$38/\text{hr} \times 6 \text{ hrs}$	<u>228</u>
	\$ 228

C. TANK NO. 6 RESIDUES:

Based on 100 gallons of sludge

Disposal at Chem-Met Services	
$\$0.21/\text{gal} \times 100 \text{ gal}$	\$ 21
Clean-out and transposition	
$\$38/\text{hr} \times 6 \text{ hrs}$	<u>228</u>
	\$ 249

D. CONTAMINATED SOIL:

Based on 500 sq ft 6 in deep

Disposal at Chem-Met Services	
$\$42/\text{cu yd} \times 10 \text{ yd}$	\$ 420
Skimming and transposition	
$\$39/\text{hr} \times 4 \text{ hrs}$	<u>156</u>
	\$ 576

E. ESTIMATE TOTAL COST:

Based on worst-case of each of the above

A.	\$ 1,590
B.	1,204
C.	249
D.	<u>576</u>
	\$ 3,619

SALCO, INCORPORATED
704 CONANT STREET
MONROE, MICHIGAN 48161
EPA I.D. No. MID000722728

ADDENDUM 11/10/83 TO CLOSURE PLAN

DATE OF CLOSURE

Salco, Incorporated expects to begin closure 180 days after submission of this closure plan to the EPA Regional Administrator.

Date of submission: 11/18/83

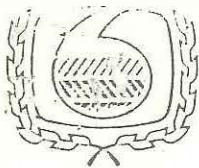
Date of intended closure start: 5/18/84

PRESENT STATUS OF THE SITE

- A. There is no hazardous waste stored on site, nor will there be any at any future date.
- B. The last hazardous waste stored on site was 330 gallons of liquid consisting of methyl ethyl ketone and isopropyl alcohol; in hazardous waste tank #6. That material was shipped to U.S. Chemical on 6/30/83.
- C. Hazardous waste tank #6 (3000 gallon capacity) has only a few inches of sludge remaining in the bottom to be cleaned out. Based on what wastes were stored in that tank, this ~~sludge should~~ consist of settled paint and can-coating solids.
- D. No spills of hazardous waste have occurred on the site.

ANTICIPATED CLOSURE COSTS (refer to closure plan for break-down)

- | | |
|-----------------------------------------------------------------------------------------------------------------------------------|------------|
| A. Drums disposal | \$00.00 |
| B. Bulk waste disposal | \$00.00 |
| C. Tank #6 residues disposal | \$249.00 |
| D. Contaminated soil disposal; if deemed necessary by the DNR or EPA. | \$576.00 |
| E. Total cost | \$825.00 |
| F. Surety bond assets | \$3,619.00 |
| G. Engineer's fee for certification of closure plan compliance will be adequately covered by the anticipated surety bond surplus. | \$2794.00 |



NOV 23 1985

1810 North 12th Street
P.O. Box 2186
Toledo, Ohio 43603
(419) 241-7175

Registered
Engineers
Chemists and
Geologists

William F. Boyle, president
Thomas R. Uhler, P.E., vice president
Technical Services
Daniel A. Kaniarz, P.E., chief
Geotechnical Division

Founded in 1927

Toledo Testing Laboratory, Inc.

October 21, 1985

COPY FOR YOUR
INFORMATION

United States Environmental Protection Agency
Region 5
RCRA Activities
230 South Dearborn St.
P.O. Box A3587
Chicago, Illinois 60604

RECEIVED

OCT 29 1985

RE: CLOSURE PLAN MODIFICATION: MARCH, 1984
SALCO INDUSTRIAL SERVICES
MONROE, MICHIGAN
MID000722728 *6 TR TSD PA*
SALCO HAZARDOUS WASTE CLOSURE CERTIFICATION
T.T.L. JOB NO. 7357

SWB - AIS
U.S. EPA, REGION V

Gentlemen:

I have reviewed the Salco Closure Plan, dated July 10, 1983; the attached addendum dated November 10, 1983; the Salco Closure Plan Modification, dated March, 1984 and the E.P.A. Approval of Closure Plant Modification, prepared by Mr. Basil G. Constantelus, dated July 2, 1984.

Our laboratory performed inspection and chemical analysis services at the above referenced site. Enclosed as Figures 1 through 7 are our reports documenting the clean up operation at the site.

Based on the closure requirements and our inspection and chemical analysis results, I certify that the Salco Hazardous Waste Site (E.P.A. I.D. No. MID000722728) has been closed in accordance with the closure documents.

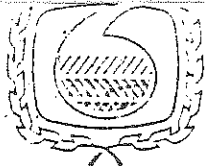
Very truly yours,

TOLEDO TESTING LABORATORY, INC.

Daniel A. Kaniarz

Daniel A. Kaniarz, P.E.
Chief Geotechnical Engineer

DAK/mg



1810 North 12th Street
P.O. Box 2186
Toledo, Ohio 43603
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Geotechnical Division

1 .ded in 1927

Toledo Testing Laboratory, Inc.

July 31, 1985

Ms. May Gillespie
Salco Industrial Services
704 Conant Street
Monroe, Michigan 48161

RE: MONITORING AND TESTING OF
HAZARDOUS WASTE CLOSURE SITE
SALCO INDUSTRIAL SERVICES
WOOD STREET
MONROE, MICHIGAN
T.T.L. JOB NO. 7357

Dear Ms. Gillespie:

This letter report presents the results of monitoring and testing program that we performed at the above referenced project. This program was performed in accordance with specifications outlined in Closure Plan Modification Document (identified as "Closure Plan Modification: March, 1984, Salco, Incorporated; Monroe, Michigan, MID000722728) and with the approval of the closure plan letter prepared by Mr. Basil G. Constantelos of the United States Environmental Protection Agency, Region 5 stamped July 2, 1984. On July 8, 1985, our staff geologist monitored the stripping of the hazardous waste drum area. Several representative soil samples were collected by our geologist from the drum area and from a "clean" control area. Sealed in air tight glass jar containers and transported to our laboratory for chemical analysis. The limits of the site as well as the location of the soil samples are presented on the Site Location Plan, Plate 1. The observations made by our staff geologist during the stripping operation are presented on the Daily Inspection Report, Figure 1.

The soil samples were tested in our laboratory for the concentrations of the chemical parameters 1.1.1 Trichloroethane, Toluene, Xylene and Methyl Ethyl Ketone. A gas chromatographic with a hydrogen flame detector was utilized to determine the concentrations of these parameters. The results of the chemical analysis are presented in the Tabulation of Chemical Analysis, Figure 2.

Based on the chemical analysis conducted during this monitoring program, no detectable concentrations of the suspected contaminants were found present in the stripped soil. Thus, no additional stripping is required as outlined in the closure program and we feel the closure program has been complete.



Ms. May Gillespie
Salco Industrial Services
Monroe, Michigan 48161

July 31, 1985
Page 2

It is hoped that the data presented herein is sufficient to fulfill your present requirements. Should you have any questions or require additional information please contact our office.

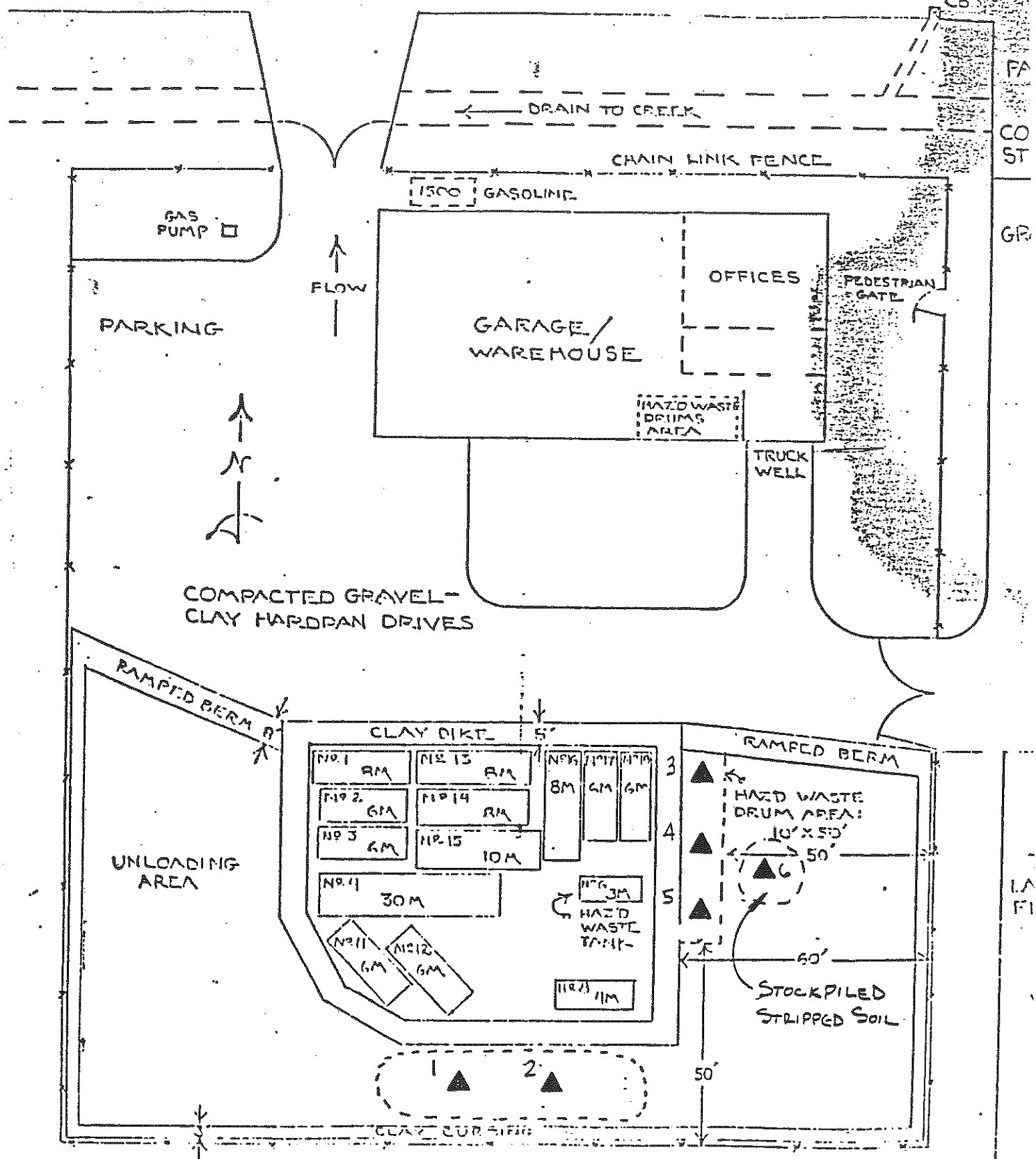
Very truly yours,

TOLEDO TESTING LABORATORY, INC.

A handwritten signature in cursive script, reading "Daniel A. Kanairz".

Daniel A. Kanairz, P.E.
Chief Geotechnical Engineer

DAK/dmr



LEGEND

SOIL SAMPLES COLLECTED BY
TOLEDO TESTING LABORATORY, INC.
ON 7/8/85

SITE LOCATION PLAN

PLATE 1



Toledo Testing Laboratory, Inc.
Engineers • Chemists • Geologists

1810 North 4th Street
P.O. Box 2186
Toledo, Ohio 43603
(419) 241-7175

Certificate of Test

Ms. May Gillespie
Salco Industrial Services
704 Conant Street
Monroe, Michigan 48161

T.T.L. Job No.: 7357
Date: July 8, 1985

MONITORING AND TESTING OF
HAZARDOUS WASTE CLOSURE SITE
SALCO INDUSTRIAL SERVICES
WOOD STREET
MONROE, MICHIGAN

DAILY INSPECTION REPORT

On this date, a representative of this laboratory visited the above referenced job to monitor and document the removal of a 6 inch thick layer of suspected contamination soil, from an area measuring approximately 10' x 30', to sub-divide the area into 3, 10' x 10' sections, to take one sample from below the excavated material at the midpoint of each of the three subdivided cells and to take two soil samples from a control area as designated on the drawings.

Upon arriving at the site two control samples were taken from the general area designated on the drawing. The control samples were taken from along the approximate east-west centerline of a drive area midway between a property line fence and the south containment dike of the waste oil storage tank area. Control sample No. 1 was taken approximately 6 feet west and control sample No. 2 was taken approximately 6 feet east of a north-south centerline dividing the storage tank area. The contractor then excavated the designated area, final measurements of the excavated area were approximately 12' wide x 30' long x 1' deep. The excavated material was stockpiled on site, along the east edge of the excavation. Salco Industries has indicated that this excavated material will be disposed of off site only if and when it is found to be contaminated. Sample No. 6 was taken for this purpose from the stockpiled material, at the owners request. The excavated area was then subdivided into three cells which measured approximately 12' wide x 10' long. A sample was then taken from the midpoint of each cell, sample No. 3 from the north most cell, sample No. 4 from the center cell and sample No. 5 from the south most cell. All samples were then returned to the laboratory, in airtight jars, for chemical analysis.

Respectfully submitted,

TOLEDO TESTING LABORATORY, INC.
R. Studer, Geologist

Daniel A. Kaniarz, P.E.
Chief Geotechnical Engineer

3 - Salco Industrial Services



Toledo Testing Laboratory, Inc.
Engineers • Chemists • Geologists

1810 North 12th Street
P.O. Box 2186
Toledo, Ohio 43603
(419) 241-7175

Certificate of Test

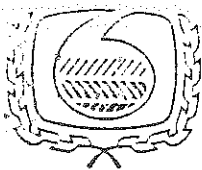
Ms. May Gillespie
Salco Industrial Services
704 Conant Street
Monroe, Michigan 48161

T.T.L. Job No.: 7357
Date: July 31, 1985

MONITORING AND TESTING OF
HAZARDOUS WASTE CLOSURE SITE
SALCO INDUSTRIAL SERVICES
WOOD STREET
MONROE, MICHIGAN

TABULATION OF CHEMICAL ANALYSIS

<u>SAMPLE NUMBER</u>	<u>DESCRIPTION</u>	<u>CONCENTRATIONS IN PPM</u>			
		<u>1:1:1 TRICHLORETHANE</u>	<u>TOLUENE</u>	<u>XYLENE</u>	<u>MEK</u>
1	Control area (west)	<1	<1	<1	<1
2	Control area (east)	<1	<1	<1	<1
3	Drum area (north cell)	<1	<1	<1	<1
4	Drum area (center cell)	<1	<1	<1	<1
5	Drum area (south cell)	<1	<1	<1	<1
6	Stockpiled stripped material	<1	<1	<1	<1



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Geotechnical Division

Founded in 1927

Toledo Testing Laboratory, Inc.

September 10, 1985

Ms. May Gillespie
Salco Industrial Services
704 Conant Street
Monroe, Michigan 48161

RE: MONITORING AND TESTING OF
NO. 6 HAZARDOUS WASTE TANK
SALCO INDUSTRIAL SERVICES
WOOD STREET
MONROE, MICHIGAN
T.T.L. JOB NO. 7357

Dear Ms. Gillespie:

This letter report presents the results of monitoring and testing program that we performed at the above referenced project. This program was performed in accordance with specifications outlined in Closure Plan Modification Document (identified as "Closure Plan Modification: March, 1984, Salco, Incorporated; Monroe, Michigan, MID000722728) and with the approval of the closure plan letter prepared by Mr. Basil G. Constantelos of the United States Environmental Protection Agency, Region 5 stamped July 2, 1984. On August 20, 1985, our industrial hygienist obtained an air sample of the air contained in the waste tank. The sample was obtained with a charcoal tube and sealed in a glass jar container and transported to our laboratory for chemical analysis.

The charcoal tube sample was tested in our laboratory for the concentrations of the chemical parameters 1.1.1 Trichloroethane, Toluene, Xylene and Methyl Ethyl Ketone. A gas chromatographic with a hydrogen flame detector was utilized to determine the concentrations of these parameters. The results of the chemical analysis are presented in the Tabulation of Chemical Analysis, Figure 1.

Based on the chemical analysis conducted during this monitoring program, only slight concentrations of Toluene (2.2 P.P.M.) were found present in the air from the waste tank.

It is hoped that the data presented herein is sufficient to fulfill your present requirements. Should you have any questions or require additional information, please contact our office.

Very truly yours,

TOLEDO TESTING LABORATORY, INC.

Daniel A. Kaniarz, P.E.
Chief Geotechnical Engineer



Toledo Testing Laboratory, Inc.
Engineers • Chemists • Geologists

1810 North Main Street
P.O. Box 2186
Toledo, Ohio 43603
(419) 241-7175

Certificate of Test

Ms. Mary Gillespie
Salco Industrial Services
704 Conant Street
Monroe, Michigan 48161

T.T.L. Job No.: 7357
Date: July 31, 1985
MONITORING AND TESTING OF
NO. 6 HAZARDOUS WASTE TANK
SALCO INDUSTRIAL SERVICES
WOOD STREET
MONROE, MICHIGAN

TABULATION OF CHEMICAL ANALYSIS

<u>SAMPLE NUMBER</u>	<u>CONCENTRATIONS IN PPM</u>			
	<u>1:1:1 TRICHTHORETHANE</u>	<u>TOLUENE</u>	<u>XYLENE</u>	<u>MEK</u>
1	< 1	2.2	< 1	< 1



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 5

230 SOUTH DEARBORN ST.

CHICAGO, ILLINOIS 60604

APR 08 1987

REPLY TO THE ATTENTION OF:

5HE-12

U.S. EPA ID #: MID000722728

SALCO CORP DBA CIS
704 CONANT ST
MONROE

MI 48161

Re: Letter of Warning
RCRA Financial Responsibility

Dear Owner/Operator:

On October 30, 1986, the State of Michigan was granted final authorization by the Administrator of the United States Environmental Protection Agency (U.S. EPA) to administer a hazardous waste program in lieu of the Federal program. As a result of final authorization, Michigan is required to enforce the provisions of the Resource Conservation and Recovery Act (RCRA). One of these provisions (40 CFR Part 265, Subpart H) requires all hazardous waste facilities to demonstrate financial responsibility for closure/post-closure care and liability coverage.

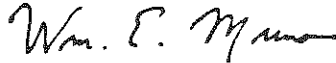
In preparation for the transfer of financial responsibility documents to Michigan, we have reviewed our files for the adequacy of these documents. This file review has indicated that the above facility is in apparent violation of the Michigan Hazardous Waste Management Act, 1979 PA 64, Part 7 (the Michigan equivalent of 40 CFR Part 265, Subpart H) for the following reason(s):

- ☒ Failure to provide adequate financial assurance coverage for closure/post-closure costs (i.e., trust agreement, surety bond, letter of credit, certificate of insurance, financial test and corporate guarantee)
- ☒ Failure to provide adequate coverage for sudden accidental occurrences (i.e., liability insurance and/or financial test)
- ☐ Failure to provide adequate coverage for nonsudden accidental occurrences (i.e., liability insurance and/or financial test)

Please review your records and submit the appropriate documents within thirty days of receipt of this letter to the Director of the Michigan Department of Natural Resources, P.O. Box 30028, Lansing, Michigan 48909, ATTENTION: Hazardous Waste Division.

If you have any questions or desire additional information, please contact Ms. Sharon Johnson or Mr. Ronald Brown of my staff at (312) 886-4581 or (312) 353-7921, respectively.

Sincerely yours,

A handwritten signature in cursive script, appearing to read "Wm. E. Muno".

William E. Muno, Chief
RCRA Enforcement Section

cc: John Bohunsky, MDNR

CANCELLATION NOTICE

MID-000722728

Valduz A. Adamkus
Regional Administrator
Region 5
230 South Dearborne
Chicago, Illinois 60604

RE: Bond No. 1-113-198-9 Dated Sept. 29, 1983 Amount \$ 3,619.00

Principal: SALCO, INCORPORATED

Obligee: U.S. Environmental Protection Agency

Description: financial guarantee, closure surety bond

WHEREAS, The Ohio Casualty Insurance Company (hereinafter called the Surety) executed, on the date indicated in the caption, a certain bond as described for and on behalf of the Principal and in favor of the Obligee whose names are written above, and

WHEREAS, by the terms of said bond, it is provided that the said Surety shall have the right to terminate its suretyship thereunder by serving notice of its election so to do upon the said Obligee, and

WHEREAS, the said Surety desires to take advantage of the terms of said bond as above referred to and does hereby elect to terminate its liability in accordance with the provisions thereof,

NOW, THEREFORE, you are hereby notified that THE OHIO CASUALTY INSURANCE COMPANY shall, ~~on~~ at the expiration of 120 days after the receipt of this notice (delete portion inapplicable) consider itself released from all liability by reason of any default committed thereafter by said Principal.

SIGNED AND SEALED this 8th day of October, 19 84

THE OHIO CASUALTY INSURANCE COMPANY

By

Jeffrey D. Sweeney
Jeffrey D. Sweeney, Attorney-in-fact

CERTIFIED MAIL ☒
REGISTERED MAIL ☐
RETURN RECEIPT REQUESTED

Form S-2068-A

RECEIVED

OCT 17 1984

U.S. EPA, REGION V
WASTE MANAGEMENT DIVISION
OFFICE OF THE DIRECTOR

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5

DATE: OCT 06 1994

SUBJECT: Referral of Salco, Inc.
MID 000 722 728

RECEIVED
WMD RECORD CENTER

FROM: Joseph M. Boyle, Chief
RCRA Enforcement Branch

ORIGINAL SIGNED BY
JOSEPH M. BOYLE

NOV 29 1994

TO: Richard Karl, Chief
Emergency Response Branch

The purpose of this memo is to refer the Salco, Inc. (Salco) facility to the Office of Superfund, Emergency Response Branch for follow-up as appropriate pursuant to the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) authorities. Based on information provided by the Michigan Department of Natural Resources (MDNR) there appears to be a potential threat to human health and the environment at this facility (Attachments). Based on the potential threats, present site conditions and the financial condition of the company the RCRA Enforcement Branch believes the site warrants a screening site inspection (SSI) to evaluate whether future CERCLA emergency and/or remedial actions are necessary.

Salco, a former generator, transporter, and storage facility of hazardous waste located in Monroe, Michigan, is comprised of a tank farm, an underground storage tank and various other types of waste containers. The RCRA regulated tank has completed RCRA closure and has been certified "clean closed". MDNR estimates there are nearly 200,000 gallons of waste remaining on the property. It has not been determined whether the wastes in question are regulated pursuant to RCRA. The wastes are believed to be primarily used oils. The waste characterization is further complicated by the fact that many owners have operated at this facility and the nature of their activities have not been well documented. The MDNR indicates the primary business over the years has been as a state licensed liquid industrial (non-hazardous) and hazardous waste hauler.

The MDNR has attempted to address the waste characterization and removal through discussions with the current and past owners. The past and current owners have historically provided little or no cooperation in resolving the problems at the facility and there is no indication that this level of cooperation will change in the future. Furthermore, MDNR does not believe the owner has the financial resources to adequately address the problems at the facility.

Based on the preceding facts, the RCRA Enforcement Branch is recommending that the Salco facility be transferred to the CERCLA program for an SSI and any additional follow-up, as appropriate. Also, please note that this facility is within the Southeast Michigan Initiative (SEMI) area.

If you have any questions on this matter, please contact Mike Ribordy at 6-4592.

Attachment

cc: Larry AuBuchon, MDNR
JoAnn Merrick, MDNR
bcc: Compliance File
Section File
Branch File

mrribordy:f:user:share:salco.ref

CONCURRENCE REQUESTED FROM REB			
SEC/BR SECRTRY			AP 10-6-94
OTHER STAFF	REB STAFF	REB SECTION CHIEF	REB BRANCH CHIEF
SLR 10/6/94	MR 10/6/94	SLR 10/6/94	MR 10/6/94



S.E. Michigan Field Office
15500 Sheldon Road
Northville, MI 48167

NATURAL RESOURCES COMMISSION

THOMAS J. ANDERSON
E. R. CAROLLO
JACOB A. HOEFER
STEPHEN F. MONSMA
HILARY F. SNELL
PAUL H. WENDLER
HARRY H. WHITELEY

JAMES J. BLANCHARD, Governor

DEPARTMENT OF NATURAL RESOURCES

RONALD O. SKOOG, Director

May 22, 1985

Mr. Frank Fulner, Manager
Salco Industrial Services
704 Conant Street
Monroe, MI 48161

RE: MID 000722728

Dear Mr. Fulner:

On May 16, 1985, acting as a representative of the United States Environmental Protection Agency, I performed an inspection of your facility located at the above address. The purpose of this inspection was to evaluate compliance of that facility with the requirements of Subtitle C of the Resource Conservation and Recovery Act (RCRA) as amended.

As a result of that inspection, it has been determined that your facility has no RCRA transporter deficiencies in the areas reviewed during that inspection.

You have been very delinquent in the proper closure of your storage area. The following is to be accomplished within 30 days from the date of this letter:

1. A lab performing the analytical work per the closure plan must be identified and contracted.
2. A consultant capable of performing the engineering work and certification per the closure plan must be identified and contracted.
3. Closure should be initiated.

You are requested to respond to this letter within the time frame stated above providing documentation regarding your actions taken. If you have any questions, please contact me at (313) 459-9180.

Sincerely,

Larry AuBuchon
HAZARDOUS WASTE DIVISION

LA:jg

cc: U.S. EPA Region V
B. Okwumabua

RCRA Inspection Report

EPA Identification Number: M I D 0 0 0 7 2 2 7 2 8

Installation Name: Salco Industrial Services

Location Address: 704 Conant Street

City: Monroe

State: Michigan 48161

Date of inspection: 5/16/85

Time of inspection (from) 0900 (to) 1115

Person(s) interviewed

Title

Telephone

Frank Fulmer

Manager

(313) 243-2820

Mary Gillespie

Inspector(s)

Agency/Title

Telephone

Larry A. Budon

MDNR/HWA/WQS

(313) 454-9180

Installation Activity (mark only one box)

Inspection Form(s)

☒ ~~Treatment/Storage/Disposal~~ per 40 CFR 265.1 and/or
Generation and/or Transportation

A

☐ Treatment/Storage/Disposal (no generation or Transportation)

A

☐ Generation and Transportation

B, C

☐ Generation only

B

☐ Transportation only

C

cc: EPA

Company
B. Okunabua

Remarks:

This facility is designated as a storage facility. A closure plan had been approved by EPA however facility has not initiated closure. The specific storage inspection was not completed, emphasis was given to completion of closure. Most storage requirements are followed.

STATE OF MICHIGAN



S.E. Michigan Field Office
15500 Sheldon Road
Northville, MI 48167

NATURAL RESOURCES COMMISSION

THOMAS J. ANDERSON
CAROLLO
J.B. A. HOEFER
STEPHEN F. MONSMA
HILARY F. SNELL
PAUL H. WENDLER
HARRY H. WHITELEY

JAMES J. BLANCHARD, Governor

DEPARTMENT OF NATURAL RESOURCES

RONALD O. SKOOG, Director

MID

MID 000722728

February 12, 1985

Mr. Frank Fulner, Manager
Salco Industrial Services
704 Conant Street
Monroe, MI 48161

RE: MID 000722728

Dear Mr. Fulner:

This letter is to acknowledge receipt of your letter dated January 22, 1985, indicating your compliance program for Act 64/Act 136 deficiencies cited during my inspection on January 3, 1985. I consider your response acceptable at this time and will evaluate the adequacy of your program during future inspections.

Thank you for your cooperation. If you have any questions, please feel free to contact me at (313) 459-9180.

Sincerely,

Larry AuBuchon
HAZARDOUS WASTE DIVISION

cc: B. Okwumabua



NATURAL RESOURCES COMMISSION

JOE A. HOEFER
T. M. LAITALA
HILARY F. SNELL
PAUL H. WENDLER
HARRY H. WHITELEY

James J. Blanchard, Governor

DEPARTMENT OF NATURAL RESOURCES

STEVENS T. MASON BUILDING
BOX 30028
LANSING, MI 48909

Hazardous Waste Division
Detroit District Office
1120 W. State Fair Ave.
Detroit, MI 48203
(313) 368-3335

August 19, 1983

Salco Industrial Services
704 Conant
Monroe, MI 48161

EPA ID No: MID 000722728

Attention: Frank Fulner, General Mgr.

Dear Mr. Fulner:

On August 2, 1983 I conducted an inspection at your facility as a follow up to the RCRA inspection on June 2, 1983. During this meeting we reviewed and discussed the RCRA Compliance Status Report dated July 10, 1983 which you submitted in response to our original inspection.

At the time of our meeting the following determinations were made and discussed.

1. The U.S. EPA regional administrator has not been notified of change in property ownership as required per 40 CFR 270.72(d). Owner Certification on your Part A Hazardous Waste Permit Application submitted on 11/19/80 was incorrect.
2. Though you indicate you are currently addressing this issue, facility personnel has not successfully completed a program of training as required per 40 CFR 265.16(a)(b)(c).
3. Adequate personnel training records/documents have not been developed as required per 40 CFR 265.16(d)(e).
4. Though a contingency plan has been developed there appear to be several listings of governmental agencies and telephone listing which are obsolete.
5. A written statement was included in the status report as follows; "the general manager of Salco Industrial Services has stated that as of June 24, 1983, it is the intention of the company to remove all hazardous waste stored on the site as soon as possible." As discussed, please be advised that you are required to meet all applicable Closure and Post-closure requirements including all closure performance standards as documented in a satisfactory closure plan as required per 40 CFR 265 - Subpart G. As per that section all specified time schedules must be adhered to.

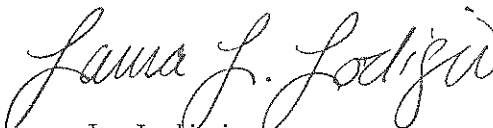
Frank Fulner
August 19, 1983
page 2

6. Though a closure plan has been written and included in the contingency plan, the adequacy and completeness of the plan will need to be reviewed and evaluated as appropriate by the U.S. EPA.
7. At the time of our meeting you stated as was indicated in your waste inventory and operating log that you have transported all hazardous waste being stored at your facility to an off-site facility for disposal. Based on that information, (i.e. there was no hazardous waste being stored on-site) I was unable to make several compliance determinations on the ongoing activities of your facility even though you have addressed most of these requirements in your status report. Please be advised that any on-site storage in the future must be done in a manner to comply with all interim status standards. As determined you have not always done so in the past and are now aware of all applicable regulations.

You indicated you would be taking action to address the above issues as soon as possible. Please respond in writing confirming your intentions and measures taken to correct the above.

If you have questions regarding these matters please contact me.

Sincerely,
HAZARDOUS WASTE DIVISION



Laura L. Lodisio
DETROIT DISTRICT OFFICE

LLL:pf

cc: U.S. EPA
K. Burda
J. Bohunsky

NATURAL RESOURCES COMMISSION

JACOB A. HOEFER
L. M. LAITALA
HILARY F. SNELL
PAUL H. WENDLER
HARRY H. WHITELY

825
8-2-83
Code X
STATE OF MICHIGAN



James J. Blanchard, Governor

DEPARTMENT OF NATURAL RESOURCES

STEVENS T. MASON BUILDING
BOX 30028
LANSING, MI 48909
HOWARD A. TANNER, Director

June 16, 1983

Hazardous Waste Div.
Detroit District Office
1120 W. State Fair Ave.
Detroit, MI 48207
(313) 368-3335

Salco
704 Conant
Monroe, MI 48161

Attention: Frank Fulner, Mgr.

EPA ID. No. MID 000722728

Dear Mr. Fulner:

On June 2, 1983, I conducted an inspection of your facility located at 704 Conant, Monroe, MI to evaluate compliance of that facility with the requirements of subtitle C of the Resource Conservation and Recovery Act (RCRA) as amended.

As a result of that inspection, it has been determined that the above facility is in violation of the requirements of subtitle C of RCRA. Specifically, the following was found:

1. The U.S. EPA regional administrator has not been notified of change in property ownership as required per 40 CFR 270.72(d).
2. A written waste analysis plan has not been developed and followed as required per 40 CFR 265.13.
3. A written schedule for inspecting all monitoring equipment, safety and emergency equipment, security devices and operating and structural equipment that are important to preventing, detecting or responding to environmental and human health hazards has not been developed and followed as required per 40 CFR 265.15.
4. Facility personnel has not successfully completed a program of classroom instruction or on-the-job training that teaches them to perform their duties in a way that ensures the facility's compliance with the requirements of RCRA as required per 40 CFR 265.16(a)(b)(c).
5. Personnel training records/documents have not been developed and maintained as required per 40 CFR 265.16(d)(e).
6. "No Smoking" signs are not conspicuously placed wherever there is a hazard from ignitable or reactive wastes as required per 40 CFR 265.17(a).
7. A contingency plan has not been developed and maintained as required per 40 CFR 265 - Subpart D.

Salco

INDUSTRIAL
SERVICES

704 Conant St.
Monroe, Mich. 48161

Phone (313) 243-2820

Toledo (419) 255-6463

August 11, 1983

STATUS REPORT - RCRA COMPLIANCE 7/10/83

Page 13; insert a. through Page 13; insert e.

to be inserted in report between pages 13 and 14.

cc: L. Lodisio ✓
E. Williams

R. Hine

R. Hine

RECEIVED

AUG 15 1983

800 DETROIT DIST

HAZARDOUS WASTE STORAGE FACILITY
PERSONNEL TRAINING LOG

To comply with 40 CFR Part 265.16

TRAINING PROGRAM SUBJECTS

I ORIENTATION

A. FACILITY FAMILIARIZATION

1. Discussion of Site Diagram
2. Tour of Facility, pointing out locations of:
 - a. fire extinguishers
 - b. first aid kit
 - c. security alarm system
 - d. warehouse hazardous drums (aqueous) area
 - e. bermed yard hazardous drums (solvents) area
 - f. hazardous waste storage tank #6
 - g. diked/bermed areas
 - h. personal safety clothing/equipment storage area
 - i. sorbent materials storage
 - j. spill tools (shovels, etc.)
 - k. telephones & emergency numbers

B. HAZARDOUS WASTES FAMILIARIZATION

1. D001 Ignitable
2. D002 Corrosive
3. D003 Reactive
4. D0-- Toxic series
5. F001, F002 Halogenated solvents
6. F003, F004, F005 Non-halogenated solvents
7. F007, F009 Plating bath wastes containing cyanides
8. Emergency Response Guidebook

C. HAZARDOUS WASTE MANIFEST FAMILIARIZATION

1. Discuss all sections of manifest
2. Matching incoming drums/bulk waste materials to manifest
3. Accepting/rejecting manifested load

II HANDLING HAZARDOUS WASTES

A. DRUMS

1. Loading/unloading
2. Leakers
3. Placards and hazardous waste labels

4. Proper storage areas
5. Proper storage arrangement
6. Incompatible wastes
7. Daily inspection of storage areas
8. Sampling

B. BULK SOLVENT

1. Loading/unloading
 - a. grounding cable
 - b. hose connection
 - c. breaking hose connection; spill buckets
 - d. venting pump exhaust
 - e. placards
 - f. handling small spillage
 - g. smoking
 - h. sampling tank truck contents
 - i. driver manual
2. Hazardous waste storage tank #6
 - a. inspection
 - b. volume measurement
 - c. sampling contents

III SAFETY

A. PERSONAL SAFETY CLOTHING/EQUIPMENT

1. Use of each item
 - a. hard hat
 - b. chemical goggles
 - c. face shield
 - d. gloves
 - e. boots
 - f. splash suits
 - g. respirator
2. Checking out for use
3. Checking in after use
 - a. cleaning
 - b. inspecting and reporting damage

B. FIRE EXTINGUISHERS

1. Proper use
 - a. CO₂
 - b. dry chemical
2. Replace/refill procedure

C. SMOKING RESTRICTIONS

D. PERSONAL CONTAMINATION

1. Solvents
2. Corrosives
3. Toxic series
4. Emergency Response Guidebook

IV SECURITY

A. THE ALARM SYSTEM

1. Turning on and turning off
2. Setting yard system
3. False alarms

B. FENCE/GATES

V CONTINGENCY PLAN

A. Locations where plans are posted

B. Discuss plan, item by item

VI HAZARDOUS WASTE MANIFEST SYSTEM: RECORD KEEPING & REPORTING

A. USE OF THE MANIFEST

1. Filling out manifest
2. Signing/dating manifest
3. Noting discrepancies
4. Rejected load procedure
5. Manifest copies distribution
 - a. generator
 - b. transporter
 - c. TSDF site
 - d. DNR, EPA
 - e. retained

B. RETAINED MANIFESTS FILE

VII FACILITY OPERATING RECORD

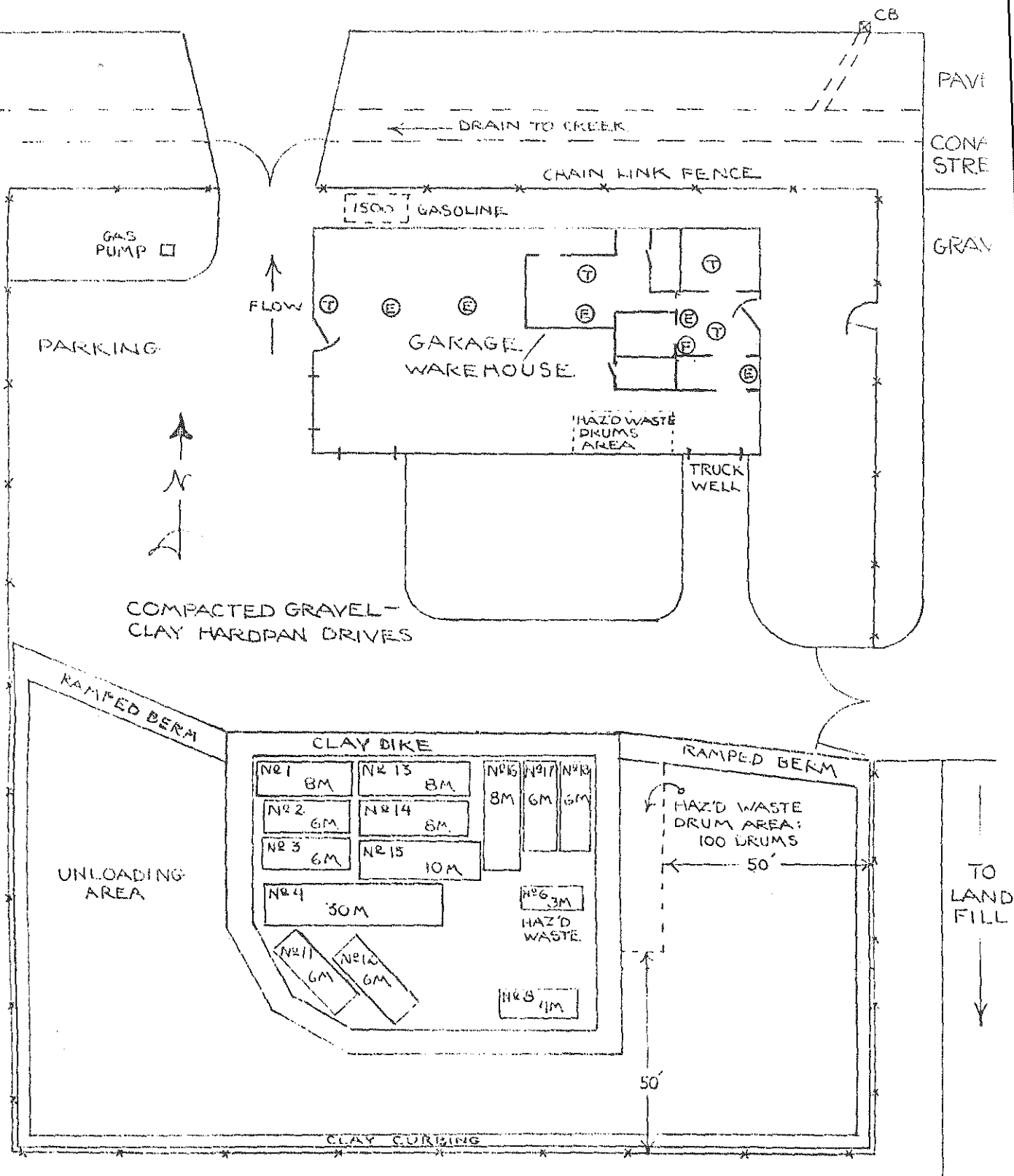
- A. HAZARDOUS WASTE STORAGE LOG
- B. WASTE ANALYSIS RECORD
- C. INCIDENTS RECORDS AND REPORTS
- D. INSPECTION RECORDS

STATUS REPORT - RCRA COMPLIANCE 7/10/83
 Salco, Incorporated
 Monroe, Michigan
 EPA I.D. No. MID000722723
 Page 13; insert d.

EMPLOYEE TRAINING: SITE DIAGRAM

- Ⓣ = TELEPHONE
- Ⓔ = FIRE EXTINGUISHER
- Ⓕ = FIRST AID KIT

WOOD STREET (CONCRETE PAVE)



EMPLOYEE TRAINING RECORD

NAME _____ DATE HIRED _____

JOB TITLE _____

Supervisor circle & initial required
subjects related to employee's job.

Employee confirms that he/she
received training indicated.

INSTRUCTOR & EMPLOYEE
DATE AND INITIAL

SUBJECTS

initial annual annual
training review review

I ORIENTATION

- A. FACILITY FAMILIARIZATION.....
B. HAZARDOUS WASTE FAMILIARIZATION.....
C. H.W. MANIFEST FAMILIARIZATION.....

II HANDLING HAZARDOUS WASTES

- A. DRUMS.....
B. BULK SOLVENT.....

III SAFETY

- A. PERSONAL SAFETY CLOTHING/EQUIPMENT....
B. FIRE EXTINGUISHERS.....
C. SMOKING RESTRICTIONS.....
D. PERSONAL CONTAMINATION.....

IV SECURITY

- A. THE ALARM SYSTEM.....
B. FENCE/GATES.....

V CONTINGENCY PLAN

- A. LOCATIONS OF POSTED PLANS.....
B. DISCUSS PLAN, ITEM BY ITEM.....

VI H.W. MANIFEST SYSTEM: record keeping
and reporting.

- A. USE OF THE MANIFEST.....
B. RETAINED MANIFEST FILE.....

VII FACILITY OPERATING RECORD

- A. HAZARDOUS WASTE STORAGE LOG.....
B. WASTE ANALYSIS RECORD.....
C. INCIDENTS RECORDS AND REPORTS.....
D. INSPECTION RECORDS.....

STATUS REPORT - RCRA COMPLIANCE 7/10/83
Salco, Incorporated
Monroe, Michigan
EPA I.D. No. MID000722728
Page 13; insert c.

EXAMPLE

EMPLOYEE TRAINING RECORD

NAME JANE SMITH DATE HIRED 9/9/88
JOB TITLE SECRETARY

Supervisor circle & initial required
subjects related to employee's job.

Employee confirms that he/she
received training indicated.

INSTRUCTOR & EMPLOYEE
DATE AND INITIAL

SUBJECTS

initial training annual review annual review

I ORIENTATION

ff (A) FACILITY FAMILIARIZATION..... 9/20/88 P.S. RH
ff (B) HAZARDOUS WASTE FAMILIARIZATION..... 9/20/88 P.S. RH
ff (C) H.W. MANIFEST FAMILIARIZATION..... 9/20/88 P.S. RH

II HANDLING HAZARDOUS WASTES

A. DRUMS.....
B. BULK SOLVENT.....

III SAFETY

A. PERSONAL SAFETY CLOTHING/EQUIPMENT....
ff (B) FIRE EXTINGUISHERS..... 9/30/88 P.H. P.S.
C. SMOKING RESTRICTIONS.....
D. PERSONAL CONTAMINATION.....

IV SECURITY

A. THE ALARM SYSTEM.....
B. FENCE/GATES.....

V CONTINGENCY PLAN

ff (A) LOCATIONS OF POSTED PLANS..... 10/2/88 P.H. P.S.
ff (B) DISCUSS PLAN, ITEM BY ITEM..... 10/2/88 P.H. P.S.

VI H.W. MANIFEST SYSTEM: record keeping
and reporting.

ff (A) USE OF THE MANIFEST..... 10/9/88 P.S. P.H.
ff (B) RETAINED MANIFEST FILE..... 10/9/88 P.S. P.H.

VII FACILITY OPERATING RECORD

ff (A) HAZARDOUS WASTE STORAGE LOG..... 10/16/88 P.S. P.H.
ff (B) WASTE ANALYSIS RECORD..... 10/16/88 P.S. P.H.
ff (C) INCIDENTS RECORDS AND REPORTS..... 10/17/88 P.S. P.H.
ff (D) INSPECTION RECORDS..... 10/17/88 P.S. P.H.

HAZARDOUS WASTE STORAGE FACILITY
PERSONNEL TRAINING LOG

To comply with 40 CFR Part 265.16

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 - i. sorbent materials storage
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5. F001, F002 Halogenated solvents
6. F003, F004, F005 Non-halogenated solvents
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5. Proper storage arrangement
6. Incompatible wastes
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8. Sampling

B. BULK SOLVENT

1. Loading/unloading
 - a. grounding cable
 - b. hose connection
 - c. breaking hose connection; spill buckets
 - d. venting pump exhaust
 - e. placards
 - f. handling small spillage
 - g. smoking
 - h. sampling tank truck contents
 - i. driver manual
2. Hazardous waste storage tank #6
 - a. inspection
 - b. volume measurement
 - c. sampling contents

III SAFETY

A. PERSONAL SAFETY CLOTHING/EQUIPMENT

1. Use of each item
 - a. hard hat
 - b. chemical goggles
 - c. face shield
 - d. gloves
 - e. boots
 - f. splash suits
 - g. respirator
2. Checking out for use
3. Checking in after use
 - a. cleaning
 - b. inspecting and reporting damage

B. FIRE EXTINGUISHERS

1. Proper use
 - a. CO₂
 - b. dry chemical
2. Replace/refill procedure

C. SMOKING RESTRICTIONS

D. PERSONAL CONTAMINATION

1. Solvents
2. Corrosives
3. Toxic series
4. Emergency Response Guidebook

IV SECURITY

A. THE ALARM SYSTEM

1. Turning on and turning off
2. Setting yard system
3. False alarms

B. FENCE/GATES

V CONTINGENCY PLAN

A. Locations where plans are posted

B. Discuss plan, item by item

VI HAZARDOUS WASTE MANIFEST SYSTEM: RECORD KEEPING & REPORTING

A. USE OF THE MANIFEST

1. Filling out manifest
2. Signing/dating manifest
3. Noting discrepancies
4. Rejected load procedure
5. Manifest copies distribution
 - a. generator
 - b. transporter
 - c. TSDF site
 - d. DNR, EPA
 - e. retained

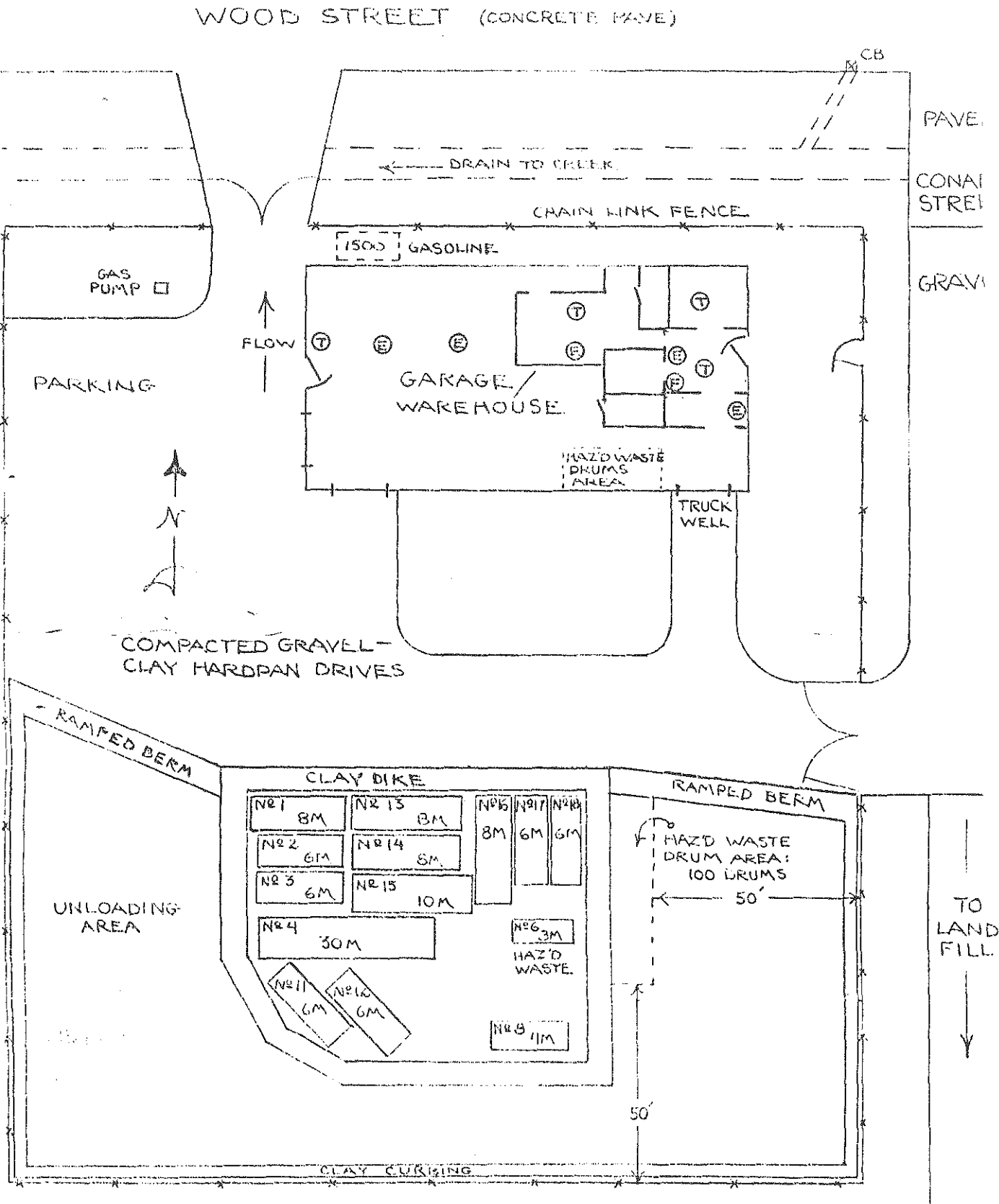
B. RETAINED MANIFESTS FILE

VII FACILITY OPERATING RECORD

- A. HAZARDOUS WASTE STORAGE LOG
- B. WASTE ANALYSIS RECORD
- C. INCIDENTS RECORDS AND REPORTS
- D. INSPECTION RECORDS

EMPLOYEE TRAINING: SITE DIAGRAM

- Ⓣ = TELEPHONE
- ⓔ = FIRE EXTINGUISHER
- Ⓟ = FIRST AID KIT



EMPLOYEE TRAINING RECORD

NAME _____ DATE HIRED _____

JOB TITLE _____

Supervisor circle & initial required
subjects related to employee's job.

Employee confirms that he/she
received training indicated.

INSTRUCTOR & EMPLOYEE
DATE AND INITIAL

SUBJECTS

initial annual annual
training review review

I ORIENTATION

A. FACILITY FAMILIARIZATION.....
B. HAZARDOUS WASTE FAMILIARIZATION.....
C. H.W. MANIFEST FAMILIARIZATION.....

II HANDLING HAZARDOUS WASTES

A. DRUMS.....
B. BULK SOLVENT.....

III SAFETY

A. PERSONAL SAFETY CLOTHING/EQUIPMENT....
B. FIRE EXTINGUISHERS.....
C. SMOKING RESTRICTIONS.....
D. PERSONAL CONTAMINATION.....

IV SECURITY

A. THE ALARM SYSTEM.....
B. FENCE/GATES.....

V CONTINGENCY PLAN

A. LOCATIONS OF POSTED PLANS.....
B. DISCUSS PLAN, ITEM BY ITEM.....

VI H.W. MANIFEST SYSTEM: record keeping
and reporting.

A. USE OF THE MANIFEST.....
B. RETAINED MANIFEST FILE.....

VII FACILITY OPERATING RECORD

A. HAZARDOUS WASTE STORAGE LOG.....
B. WASTE ANALYSIS RECORD.....
C. INCIDENTS RECORDS AND REPORTS.....
D. INSPECTION RECORDS.....

EXAMPLE

EMPLOYEE TRAINING RECORD

NAME JANE SMITH DATE HIRED 9/9/88
JOB TITLE SECRETARY

Supervisor circle & initial required
subjects related to employee's job.

Employee confirms that he/she
received training indicated.

SUBJECTS

INSTRUCTOR & EMPLOYEE
DATE AND INITIAL

initial annual annual
training review review

I ORIENTATION

- ff (A) FACILITY FAMILIARIZATION.....
ff (B) HAZARDOUS WASTE FAMILIARIZATION.....
ff (C) H.W. MANIFEST FAMILIARIZATION.....

9/20/88 J.S. RM
9/20/88 J.S. RM
9/20/88 J.S. RM

II HANDLING HAZARDOUS WASTES

- A. DRUMS.....
B. BULK SOLVENT.....

III SAFETY

- A. PERSONAL SAFETY CLOTHING/EQUIPMENT....
ff (B) FIRE EXTINGUISHERS.....
C. SMOKING RESTRICTIONS.....
D. PERSONAL CONTAMINATION.....

9/30/88 J.S. RM

IV SECURITY

- A. THE ALARM SYSTEM.....
B. FENCE/GATES.....

V CONTINGENCY PLAN

- ff (A) LOCATIONS OF POSTED PLANS.....
ff (B) DISCUSS PLAN, ITEM BY ITEM.....

10/2/88 J.S. RM
10/2/88 J.S. RM

VI H.W. MANIFEST SYSTEM: record keeping
and reporting.

- ff (A) USE OF THE MANIFEST.....
ff (B) RETAINED MANIFEST FILE.....

10/4/88 J.S. RM
10/4/88 J.S. RM

VII FACILITY OPERATING RECORD

- ff (A) HAZARDOUS WASTE STORAGE LOG.....
ff (B) WASTE ANALYSIS RECORD.....
ff (C) INCIDENTS RECORDS AND REPORTS.....
ff (D) INSPECTION RECORDS.....

10/16/88 J.S. RM
10/16/88 J.S. RM
10/17/88 J.S. RM
10/17/88 J.S. RM

Salco

INDUSTRIAL
SERVICES

704 Conant St.
Monroe, Mich. 48161

Phone (313) 243-2820

Toledo (419) 255-6463

RECEIVED
AUG 05 1983
COR. DETROIT DIST.

NOTE:

Page 2 of letter to John Bohunsky ammended to read
10 day delivery time

R. Hine

cc: L. Lodisio
E. Williams

RECEIVED
AUG 12 1983
EDWARDS, STACE

To summarize what Salco now understands from having discussed the situation with Mr. Lee:

A waste manifested from Generator A to TSDF Site B via Salco as Transporter;

A. Salco has a 10 day delivery time limit; no temporary storage allowed.

B. If the load is rejected:

Salco returns the load to the Generator

OR

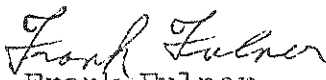
the Generator remanifests the load to a new Disposal Site

OR

the Generator may remanifest the load to Salco as TSDF Site for temporary storage, until a new Disposal Site has been designated. The Generator then remanifests the load to the new Disposal Site, with Salco as Transporter, or a new Transporter designated. Again the 10 day delivery time limit takes affect.

By following the required procedures as we now understand them, there should be no recurrence of the violation noted in the case of MI 0294230.

Respectfully,


Frank Fulner
General Manager

cc Lonnie C. Lee

Salco

INDUSTRIAL
SERVICES

704 Conant St.
Monroe, Mich. 48161

Phone (313) 243-2820

Toledo (419) 255-6463

July 20, 1983

Mr. Paul Levy
Assistant Administrator
Mercy-Memorial Hospital
718 North Macomb
Monroe, Michigan 48161

Dear Mr. Levy:

Some Liquid Hazardous Wastes, as defined by the Environmental Protection Agency and the Michigan Department of Natural Resources, are stored at our facility, or transported by Salco's vehicles. These materials are limited in quantity to a relatively few metal drums, which are stored and shipped under full Department of Transportation regulations, or bulk quantities of 3000 gallons or less in one steel tank. They are properly identified and placarded. Enclosed is a list of the hazardous wastes which Salco is permitted to store and transport.

In addition, large amounts of petroleum products (waste oils), destined for oil recyclers, are stored at this facility. These materials are combustible; they are not explosive. In the event of a release or spill, under rare circumstances fire and noxious fumes could result.

We are taking the liberty of enclosing a copy of our Contingency Plan which has been prepared for implementation in case of such an emergency.

Your services will be needed, should a release or spill event occur which calls for medical treatment or hospitalization.

Please be informed that such an event has never occurred at this facility, and is not likely to happen. The facility meets all requirements of OSHA regulations, and the regulations of the Michigan Flammable Liquids Code as well as those of the USEPA, Michigan Department of Natural Resources and the United States Coast Guard.

To comply with Federal Regulations, we require an acknowledgement, in writing, of your receipt of this letter.

Salco Industrial Services
July 20, 1983
Page 2

Should you have any questions concerning this letter or the enclosed material, please contact our Monroe office at 213-2820.

Sincerely,

A handwritten signature in cursive script, appearing to read "Tom Sallah".

Tom Sallah
President

encl

Salco

INDUSTRIAL
SERVICES

704 Conant St.
Monroe, Mich. 48161

Phone (313) 243-2820

Toledo (419) 255-6463

July 20, 1983

Ray Soleau
Chief
City of Monroe Fire Department
75 Scott Street
Monroe, Michigan 48161

Dear Chief Soleau:

Some liquid hazardous wastes, as defined by the Environmental Protection Agency and the Michigan Department of Natural Resources, are stored at our facility, or transported by Salco's vehicles. These materials are limited in quantity to a relatively few metal drums, which are stored and shipped under full DOT regulations, or bulk quantities of 3000 gallons or less stored in one steel tank. They are properly identified and placarded.

Enclosed is a list of the hazardous wastes which Salco is permitted to store and transport. Also included for your ready reference are photocopies of relevant pages of the DOT Emergency Response Guidebook.

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Salco Industrial Services

July 20, 1983

Page 2

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Sincerely,

A handwritten signature in cursive script, appearing to read "Tom Sallah".

Tom Sallah
President

encl

Salco

INDUSTRIAL
SERVICES

704 Conant St.
Monroe, Mich. 48161

Phone (313) 243-2820

Toledo (419) 255-6463

July 20, 1983

Dalvin Arnold
Chief of Police
City of Monroe Police Department
100 E. Second Street
Monroe, Michigan 48161

Dear Chief Arnold:

Some liquid hazardous wastes as defined by the Environmental Protection Agency and the Michigan Department of Natural Resources, are stored at our facility, or transported by Salco's vehicles. These materials are limited in quantity to a relatively few metal drums, which are stored and shipped under full DOT regulations, or bulk quantities of 3000 gallons or less stored in one steel tank. They are all properly indentified and placarded.

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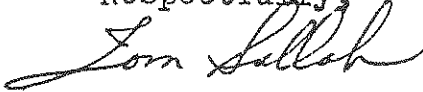
To comply with Federal Regulations we require an acknowledgement, in writing, of your receipt of this letter.

*Waste Oil *Dust Control *Industrial Waste

Salco Industrial Services
July 20, 1983
Page 2

Should you have any questions concerning this letter or the enclosed material, please contact our Monroe office at 243-2820.

Respectfully,

A handwritten signature in cursive script, appearing to read "Tom Sallah".

Tom Sallah
President

encl

Salco

INDUSTRIAL
SERVICES

704 Conant St.
Monroe, Mich. 48161

Phone (313) 243-2820
Toledo (419) 255-6463

July 20, 1983

Mr. Bernard Sieg
President
EMTS Ambulance Service
1185 W. Front Street
Monroe, Michigan 48161

Dear Mr. Sieg:

Some liquid hazardous wastes, as defined by the Environmental Protection Agency and the Michigan Department of Natural Resources, are stored at our facility, or transported by Salco's vehicles. These materials are limited in quantity to a relatively few metal drums, which are stored and shipped under full Department of Transportation regulations, or bulk quantities of 3000 gallons or less in one steel tank. They are properly identified and placarded.

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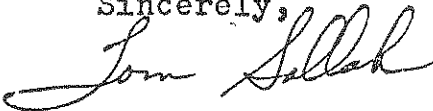
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Salco Industrial Services
July 20, 1983
Page 2

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Sincerely,

A handwritten signature in cursive script, appearing to read "Tom Sallah".

Tom Sallah
President

encl

STATUS REPORT - RCRA COMPLIANCE 7/10/83
 Salco, Incorporated
 Monroe, Michigan
 EPA ID. No. Mid000722728

HAZARDOUS WASTE MATERIALS PERMITTED FOR TEMPORARY
 STORAGE AT SALCO INDUSTRIAL SERVICES

MATERIAL	UN/NA NUMBER	GUIDE NUMBER
TETRACHLOROETHYLENE (PERCHLORETHYLENE) ...	1897	55
TRICHLOROETHYLENE (TRI)	1710	55
METHYLENE CHLORIDE (DICHLOROMETHANE)	1593	55
1,1,1-TRICHLOROETHANE (1,1,1)	2831	55
CARBON TETRACHLORIDE	1846	55
CHLORINATED FLUOROCARBONS (FREONS)	various	12
CHLOROBENZENE (MONOCHLOROBENZENE)	1134	27
ORTHODICHLOROBENZENE (ODB)	1591	58
XYLENE (XYLOL)	1307	27
ACETONE	1090	26
ETHYL ACETATE	1173	26
ETHYLBENZENE	1175	26
METHYL ISOBUTYL KETONE (MIBK)	1193	26
n-BUTYL ALCOHOL	1120	26
CYCLOHEXANONE	1915	26
METHANOL (METHYL ALCOHOL)	1230	28
CRESOLS	2076	55
CRESYLIC ACID	2022	55
NITROBENZENE	1662	55
TOLUENE (TOLUOL)	1294	27
METHYL ETHYL KETONE (MEK)	1193	26
ISOBUTANOL (ISOBUTYL ALCOHOL)	1212	26
FLAMMABLE LIQUIDS n.o.s.	1993	26
PLATING BATH SOLUTIONS CONTAINING CYANIDES	1935	55
CAUSTICS: POTASSIUM HYDROXIDE SOLUTION	1814	60
SODIUM HYDROXIDE SOLUTION	1824	60
ALKALINE CORROSIVE LIQUID n.o.s.	1719	60
ACIDS: HYDROCHLORIC ACID SOLUTION	1789	60
PHOSPHORIC ACID SOLUTION	1805	60
SULFURIC ACID SOLUTION	1830	39
NITRIC ACID SOLUTION	1760	60
CHROMIC ACID SOLUTION	1755	60
ACID, liquid n.o.s.	1760	60

status 5
Code X
HES
8-2-83

RCRA Inspection Report

EPA Identification Number: M I D 000722728

Installation Name: SALCO

Location Address: 704 CONANT

City: MONROE State: MICHIGAN

Date of inspection: 06-02-83 Time of inspection (from) 10:00 (to) 1:00

Person(s) interviewed

Title

Telephone

FRANK FULNER

MANAGER

(313)243-2820

RICHARD HINE

CONSULTANT

Inspector(s)
LAURA LODISIO

Agency/Title
MONR

Telephone
(313)368-3335

JOE BOYLE

USEPA

(312)886-3754

Installation Activity (mark only one box)

Inspection Form(s)

☒ Treatment/Storage/Disposal per 40 CFR 265.1 and/or
Generation and/or Transportation

A

☐ Treatment/Storage/Disposal (no generation or Transportation)

A

☐ Generation and Transportation

B, C

☐ Generation only

B

☐ Transportation only

C

Originally applied as SALCO - Div. of Cousins
Waste Control Corp. They are no longer
affiliated w/ Cousins.

INSPECTION FORM A

Section A: SCOPE OF INSPECTION.

1. Interim status standards for treatment storage or disposal of HAZARDOUS WASTES SUBJECT TO 40 CFR 265.1. Complete Inspection Form A sections B, C, D, E, and G.
2. Place an "X" in the box(es) corresponding to the facility's treatment, storage and disposal processes, and generation and/or transportation activity (if any). Complete only the applicable sections and appendixes.

Permit application process(es) (EPA Form 3510-3) Inspection Form A section(s)

S01	<input type="checkbox"/>	storage in containers	I
S02	<input type="checkbox"/>	storage in tanks	J
T01	<input type="checkbox"/>	treatment in tanks	J
S04	<input type="checkbox"/>	storage in surface impoundment	K,F
T02	<input type="checkbox"/>	treatment in surface impoundment	K,F
D83	<input type="checkbox"/>	disposal in surface impoundment	K,F
S03	<input type="checkbox"/>	storage in waste pile	L
D81	<input type="checkbox"/>	disposal by land application	M,F
D80	<input type="checkbox"/>	disposal in landfill	N,F
T03	<input type="checkbox"/>	treatment by incineration	O/P
T04	<input type="checkbox"/>	treatment in devices other than tanks, surface impoundments, or incinerators	Q

Other activities

GENERATOR	<input checked="" type="checkbox"/>	APPENDIX	GN
TRANSPORTER	<input checked="" type="checkbox"/>	APPENDIX	TR

3. Indicate any hazardous waste processes, by process code, which have been omitted from Part A of the facility's permit application.
4. Indicate any hazardous waste processes (by process code and line number on EPA Form 3510-3 page 1 of 5) which appear to be eligible for exclusion per 40 CFR 265.1(c). Provide a brief rationale for the possible exclusion.

Section B: GENERAL FACILITY STANDARDS: (Part 265 Subpart B)

YES NO NI* Remarks

1. Has the Regional Administrator been notified regarding: 265.12

a. Receipt of hazardous waste from a foreign source?

— — ✓

b. Facility expansion?

— — ✓

210.72 (d) → April 1, 1983

c. Change of owner or operator?

— ✓ —

Co. is in process of buying the land from Mr. Jones, current owner

2. General Waste Analysis: 265.13

a. Has the owner or operator obtained a detailed chemical and physical analysis of the waste?

— ✓ —

No waste

b. Does the owner or operator have a detailed waste analysis plan on file at the facility?

— ✓ —

analysis available.

c. Does the waste analysis plan specify procedures for inspection and analysis of each movement of hazardous waste from off-site?

— ✓ —

3. Security - Do security measures include: (if applicable) 265.14

a. 24-Hour surveillance?

— ✓ —

burglar alarm to police.

b. i. Artificial or natural barrier around facility?

✓ — —

fence

and ii. Controlled entry?

✓ — —

gates locked

c. Danger sign(s) at entrance?

✓ — —

4. Owner or operator inspections: 265.15

a. Does the owner or operator inspect the facility for malfunctions, deterioration, operator errors, and discharges of hazardous waste that may affect human health or the environment?

✓ — —

informal inspection conducted.

*Not Inspected

YES NO NI Remarks

b. Does the owner or operator have an inspection schedule at the facility?

☒ YES ☐ NO ☐ NI

c. If so, does the schedule address the inspection of the following items:

i. monitoring equipment?

☐ YES ☐ NO ☐ NI

ii. safety and emergency equipment?

☐ YES ☐ NO ☐ NI

iii. security devices?

☐ YES ☐ NO ☐ NI

iv. operating and structural equipment (i.e. dikes, pumps, etc.)?

☐ YES ☐ NO ☐ NI

v. type of problems to be looked for during the inspection (e.g. leaky fitting, defective pump, etc.)?

☐ YES ☐ NO ☐ NI

vi. inspection frequency (based upon the possible deterioration rate of the equipment)?

☐ YES ☐ NO ☐ NI

d. Are areas subject to spills inspected daily when in use?

☒ YES ☐ NO ☐ NI

Indicates so but no documentation.

e. Does the owner or operator maintain an inspection log or summary of owner or operator inspections?

☒ YES ☐ NO ☐ NI

f. Does the inspection log contain the following information:

i. the date and time of the inspection?

☐ YES ☐ NO ☐ NI

ii. the name of the inspector?

☐ YES ☐ NO ☐ NI

iii. a notation of the observations made?

☐ YES ☐ NO ☐ NI

iv. the date and nature of any repairs or remedial actions?

☐ YES ☐ NO ☐ NI

5. Do personnel training records include: 265.16

a. Job titles?

b. Job descriptions?

No training records have been developed.

	YES	NO	NI	Remarks
c. Description of training?	—	<input checked="" type="checkbox"/>	—	—
d. Records of training?	—	<input checked="" type="checkbox"/>	—	—
e. Did facility personnel receive the required training by 5-19-81?	—	<input checked="" type="checkbox"/>	—	—
f. Do new personnel receive required training within six months?	—	<input checked="" type="checkbox"/>	—	—
g. Do personnel training records indicate that personnel have taken part in an annual review of initial training?	—	<input checked="" type="checkbox"/>	—	—
6. If required, are the following special requirements for ignitable, reactive, or incompatible wastes addressed? 265.17				
a. Special handling?	<input checked="" type="checkbox"/>	—	—	<i>indicated so.</i>
b. No smoking signs?	—	<input checked="" type="checkbox"/>	—	—
c. Separation and protection from ignition sources?	<input checked="" type="checkbox"/>	—	—	—

Section C: PREPAREDNESS AND PREVENTION: (Part 265 Subpart C)

1. Maintenance and Operation
of Facility: 265.31

Is there any evidence of fire,
explosion, or release of
hazardous waste or hazardous
waste constituent?

YES NO NI

Remarks

____ ☒ ____

2. If required, does the facility
have the following equipment: 265.32

a. Internal communications or
alarm systems?

☒ ____

Telephone system

b. Telephone or 2-way radios
at the scene of operations?

☒ ____

c. Portable fire extinguishers,
fire control, spill control
equipment and decontamination
equipment?

☒ ____

extinguishers
absorbent pads, shovel, saw
BC dry chemical exting
wrench

Indicate the volume of water and/or foam available for fire control:

city water system

3. Testing and Maintenance of
Emergency Equipment: 265.33

a. Has the owner or operator
established testing and
maintenance procedures
for emergency equipment?

☒ ____

extinguishers checked
every 3 mos. by
Union Fire.
In-house every 6 mos

b. Is emergency equipment
maintained in operable
condition?

☒ ____

4. Has owner or operator provided
immediate access to internal
alarms? (if needed) 265.34

☒ ____

burglar alarm at night
Telephone system - day

5. Is there adequate aisle space
for unobstructed movement?

☒ ____

6. Has the owner or operator attempted
to make arrangements with local
authorities in case of an emergency
at the facility?

☒ ____

Fire & Police Depts

Section D: CONTINGENCY PLAN AND EMERGENCY PROCEDURES: (Part 265 Subpart D)

	YES	NO	NI	Remarks
1. Does the Contingency Plan contain the following information: 265.52				
a. The actions facility personnel must take to comply with §265.51 and 265.56 in response to fires, explosions, or any unplanned release of hazardous waste? (If the owner has a Spill Prevention, Control, and Countermeasures (SPCC) Plan, he needs only to amend that plan to incorporate hazardous waste management provisions that are sufficient to comply with the requirements of this Part (as applicable).)	<input checked="" type="checkbox"/>			<i>Have SPCC plan but is outdated & does not address hazardous waste concerns.</i>
b. Arrangements agreed by local police departments, fire departments, hospitals, contractors, and State and local emergency response teams to coordinate emergency services pursuant to §265.37?	<input checked="" type="checkbox"/>			
c. Names, addresses, and phone numbers (office and home) of all persons qualified to act as emergency coordinators?	<input checked="" type="checkbox"/>			<i>needs updating.</i>
d. A list of all emergency equipment at the facility which includes the location and physical description of each item on the list and a brief outline of its capabilities?	<input checked="" type="checkbox"/>			
e. An evacuation plan for facility personnel where there is a possibility that evacuation could be necessary? (This plan must describe signal(s) to be used to begin evacuation, evacuation routes, and alternate evacuation routes?)	<input checked="" type="checkbox"/>			
2. Are copies of the Contingency Plan available at the site and local emergency organizations? 265.53	<input checked="" type="checkbox"/>			

YES NO NI Remarks

3. Emergency Coordinator 265.55

a. Is the facility Emergency Coordinator identified?

— ☒ —

b. Is coordinator familiar with all aspects of site operation and emergency procedures?

— ☐ —

c. Does the Emergency Coordinator have the authority to carry out the Contingency Plan?

— ☐ —

4. Emergency Procedures 265.56

If an emergency situation has occurred at this facility, has the Emergency Coordinator followed the emergency procedures listed in 265.56?

— ☒ —

Section E: MANIFEST SYSTEM, RECORDKEEPING, AND REPORTING: (Part 265 Subpart E)

	YES	NO	NI	Remarks
** 1. Use of Manifest System 265.71				
a. Does the facility follow the procedures listed in §265.71 for processing each manifest? (Particularly sending a copy of the signed manifest back to the generator within 30 days after delivery.)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
b. Are records of past shipments retained for 3 years?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
** 2. Does the owner or operator meet requirements regarding manifest discrepancies? 265.72	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<i>Is now aware of these requirements.</i>
** Not applicable to owners or operators of on-site facilities that do not receive any waste from off-site sources.				
3. Operating Record 265.73				
a. Does the owner or operator maintain an operating record as required in 265.73?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<i>Only Drivers Log.</i>
b. Does the operating record contain the following information:				
i. The method(s) and date(s) of each waste's treatment, storage, or disposal as required in 40 CFR Part 265 Appendix I?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
ii. The location and quantity of each hazardous waste within the facility? (This information should be cross-referenced to specific manifest number, if waste was accompanied by a manifest.)	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
***iii. A map or diagram of each cell or disposal area				

*** only applies to disposal facilities

YES NO NI Remarks

showing the location and quantity of each hazardous waste? (This information should be cross-referenced to specific manifest number, if waste was accompanied by a manifest.)

iv. Records and results of all waste analyses, trial tests, monitoring data, and operator inspections?

v. Reports detailing all incidents that required implementation of the Contingency Plan?

vi. All closure and post closure costs as applicable?

4. Availability of Records 265.74

Are all facility records required under 40 CFR Part 265 available for inspection?

5.**Unmanifested Waste Reports 265.76

a. Has the facility accepted any hazardous waste from an off-site generator subject to 40 CFR 262.20 without a manifest or or shipping paper?

b. If "a" is yes, provide the identity of the source of the waste and a description of the quantity, type, and date received for each unmanifested hazardous waste shipment.

Keep analysis in companies file. Not in log.

none so far.

What there is.

** Not applicable to owners or operators of on-site facilities that do not receive any hazardous from off-site sources.

Section G - CLOSURE AND POST CLOSURE (Part 265 Subpart G)

	YES	NO	NI	Remarks
1. Closure 265.112				
a. Is the facility closure plan available for inspection?	<input checked="" type="checkbox"/>			<i>No plan has been developed.</i>
b. Does the plan identify:				
i. maximum extent unclosed during facility life?				
ii. maximum hazardous waste inventory?				
iv. estimated year of closure?				
v. schedule of closure activities?				
c. Has closure begun?				
*2. Post-Closure 265.118				
a. Is the post-closure plan available for inspection?				
b. Does this plan contain:				
i. description of groundwater monitoring activities and frequencies?				
ii. description of maintenance activities and frequencies for				
AA. integrity of cap, final cover, or containment structures, where applicable				
BB. facility monitoring equipment				
iii. name, address, and phone number of person or office to contact during post-closure care period?				
c. Has the post-closure period begun?				
d. Is the written post-closure cost estimate available? 265.144				

Applies only to disposal facilities.

Section I - USE AND MANGEMENT OF CONTAINERS (Part 265, Subpart I)

	YES	NO	NI	Remarks
1. Are containers in good condition? 265.171	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<u>none on site</u>
2. Are containers compatible with waste in them? 265.172	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
3. Are containers managed to prevent leaks? 265.173	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
4. Are containers stored closed?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
5. Are containers inspected weekly for leaks and defects.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<u>If kept that long</u>
6. Are ignitable and reactive wastes stored at least 15 meters (50 feet) from the facility property line? (Indicate if waste is ignitable or reactive). 265.176	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<u>Approximately</u>
7. Are incompatible wastes stored in separate containers? (If not, the provisions of 40 CFR 265.17(b) apply). 265.177	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
8. Are containers of incompatible waste separated or protected from each other by physical barriers or sufficient distance?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

Section J - TANKS (Part 265, Subpart J)

YES NO NI Remarks

1. Are tanks used to store only those wastes which will not cause corrosion, leakage or premature failure of the tank? 265.192 ✓ _____ _____

2. Do uncovered tanks have at least 60 cm (2 feet) of free-board, or dikes or other containment structures? _____ _____ no uncovered tanks for H.W.

3. Do continuous feed systems have a waste-feed cutoff? _____ ✓ no continuous feed sy

4. Are waste analyses done before the tanks are used to store a substantially different waste than before? 265.193 _____ ✓ Not documented

5. Are required daily and weekly inspections done? 265.194 _____ ✓ ✓

6. Are reactive & ignitable wastes in tanks protected or rendered non-reactive or non-ignitable? 265.198
Indicate if waste is ignitable or reactive. (If waste is rendered non-reactive or non-ignitable, see treatment requirements.) _____ ✓ ignitable

7. Are incompatible wastes stored in separate tanks? 265.199
(If not, the provisions of 40 CFR 265.17(b) apply.) _____ ✓ _____

8. Has the owner or operator observed the National Fire Protection Associations buffer zone requirements for tanks containing ignitable or reactive wastes?

Tank capacity: 3000 gallons

Tank diameter: _____ feet

Distance of tank from property line ~50' feet

(See table 2 - 1 through 2 - 6 of NFPA's "Flammable and Combustible Liquids Code - 1977" to determine compliance.)

Section A: Scope

1. Complete this Appendix if the owner or operator of a TSD facility also generates hazardous waste that is subsequently shipped off-site for treatment, storage, or disposal.

Section B: MANIFEST REQUIREMENTS (Part 262, Subpart B)

	YES	NO	NI	Remarks
(1) Does the operator have copies of the manifest available for review? 262.40				
(2) Examine manifests for shipments in past 6 months. Indicate approximate number of manifested shipments during that period.				To knowledge of Mr. Fulmer they have never generated a manifest in which the facility was designated as the generator.
(3) Do the manifest forms examined contain the following information: (If possible, make copies of, or record information from, manifest(s) that do not contain the critical elements). 262.21				
a. Manifest document number?				
b. Name, mailing address, telephone number, and EPA ID number of Generator				
c. Name and EPA ID Number of Transporter(s)?				
d. Name, address, and EPA ID Number Designated permitted facility and alternate facility?				
e. The description of the waste(s) (DOT shipping name, DOT hazard class, DOT identification number)?				
f. The total quantity of waste(s) and the type and number of containers loaded?				
g. Required certification?				
h. Required signatures?				
(4) Reportable exceptions 262.42				
a. For manifests examined in (2) (except for shipments within the last 35 days), enter the number of manifests for which the generator has <u>NOT</u> received a signed copy from the designated facility within 35 days of the date of shipment.				
b. For manifests indicated in (4a), enter the number for which the generator has submitted exception reports (40 CFR 262.42) to the Regional Administrator.				

Section C: PRE-TRANSPORT REQUIREMENTS (Part 262, Subpart C)

	YES	NO	NI	Remarks
Is waste packaged in accordance with DOT regulations? (Required prior to movement of hazardous waste off-site) 262.30	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
2. Are waste packages marked and labeled in accordance with DOT regulations concerning hazardous waste materials? (Required for movement of hazardous waste off-site) 262.31 262.32	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
3. If required, are placards available to transporters of hazardous waste? 262.33	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
4. On-site accumulation of generated hazardous wastes. A HWMF may accumulate hazardous waste it generates either (A) in its storage facility [265.1(b)] or (B) in accordance with 40 CFR 262.34 [see 265.1(c)(7)]. Option B restricts all accumulation to tanks and containers. If the installation elects option A, check this box <input type="checkbox"/> and skip to Section D. If the installation elects option B, complete the following observations: See 40 CFR 262.34 January 11, 1982 Revision				
a. Is each container clearly marked with the start of accumulation date?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<u>None on site</u>
b. Have more than 90 days elapsed since the date inspected in (a)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
c. Do wastes remain in accumulation tanks for more than 90 days?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
d. Is each container and tank labeled or marked clearly with the words "Hazardous Waste"?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

Section D: - RECORDKEEPING AND REPORTING (Part 262, Subpart D)

	YES	NO	NI	Remarks
1. Are all test results and analyses needed for hazardous waste determinations retained for at least three years? 262.40	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<u>but not in log</u>

Section E: - INTERNATIONAL SHIPMENTS (Part 262, Subpart E)

1. Has the installation imported or exported Hazardous Waste? 262.50	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
(If answered Yes, complete the following as applicable.)				
a. Exporting Hazardous waste; has a generator:				

	YES	NO	NI	Remarks
i. Notified the Administrator in writing?			<input checked="" type="checkbox"/>	
ii. Obtained the signature of the foreign consignee confirming delivery of the waste(s) in the foreign country?			<input checked="" type="checkbox"/>	
iii. Met the Manifest requirements?			<input checked="" type="checkbox"/>	
b. Importing Hazardous Waste; has the generator met the manifest requirements?			<input checked="" type="checkbox"/>	

Appendix TR

Section A: SCOPE:

1. Complete this Appendix if the owner or operator transports hazardous waste subject to 40 CFR 263.10.
2. Does the transporter transport hazardous waste into the U.S. from abroad?
3. Does the transporter transport hazardous waste out from the U.S.?
4. Does the transporter mix hazardous waste of different DOT shipping descriptions by placing them into a single container?

YES NO NI Remarks

<input checked="" type="checkbox"/>			
	<input checked="" type="checkbox"/>		
	<input checked="" type="checkbox"/>		
	<input checked="" type="checkbox"/>		

Section B: MANIFEST SYSTEM AND RECORDKEEPING (Part 263, Subpart B)

1. Are copies of completed manifests available for review and retained for three years. 263.22
2. Estimate the number of manifests for shipments completed during the past 6 months.
3. Examine a representative number of manifests. Indicate number examined.
4. Did transporter properly sign and date the manifests examined?
5. Do any manifests indicate shipments delivered to other than the designated facility? 263.21
If (5) is "no," skip 6 and 7.
6. Do any manifests indicate shipments delivered to other than an alternate facility?
7. Are shipments delivered to alternate facilities only because emergency prevents delivery to the designated facility?

<input checked="" type="checkbox"/>			
<input checked="" type="checkbox"/>			
	<input checked="" type="checkbox"/>		

Salco

INDUSTRIAL
SERVICES

704 Conant St.
Monroe, Mich. 48161

Phone (313) 243-2820
Toledo (419) 255-6463

Laura L. Lodisio
Resource Specialist
1120 W. State Fair Ave.
Detroit, Michigan 48203

Dear Ms. Lodisio:

In reply to your letter of March 23, 1983 regarding violations you found during your inspection on March 22, 1983, all vehicles are properly labeled on both sides and licenses are carried in the vehicles.

We are now manifesting oil we pick up from service stations and various places, as instructed (by DNR inter office communication dated July 14, 1982) for Act 136 wastes. I have enclosed two of these manifests.

The vehicles licensed under Act 64 to haul hazardous wastes are now properly labeled hazardous waste hauling vehicle, Salco, Monroe, Michigan, on both sides of the waste hauling portion of the vehicle.

We now know how to handle rejected shipments and keep a copy of those instructions, which I have also enclosed, on the drivers clip board with the manifests.

Thank you for all your help and information.

Sincerely,

Mary Gillespie

Mary Gillespie
for Frank Fulner

Salco Industrial Services
704 Conant St.
Monroe, Michigan 48161

RECEIVED

JUN 3 1983

GOV-DETROIT DIST

RECEIVED

JUN 8 1983

EPR-FIELD STAFF

mag/ff

*Waste Oil *Dust Control *Industrial Waste

GENERAL PURPOSE

This report is prepared as a requirement for compliance with Sub Title C of the Resource Conservation and Recovery Act as amended and promulgated by the United States Environmental Protection Agency, and inspected by the Hazardous Waste Division of the Michigan Department of Natural Resources.

This report specifically addresses certain sections of Subparts B, C, D, E, G, I, and J, and certain appendices of 40 CFR, Part 265, dated May 19, 1980, as published in the Federal Register: The Environmental Protection Agency, Hazardous Waste and Consolidated Permit Regulations.

GENERAL INFORMATION

The Company:

Salco, Incorporated
dba Salco Industrial Services
704 Conant Street
Monroe, Michigan 48161

Monroe: (313) 243-2820
Toledo: (419) 255-6463

The name of the company was changed from Salco, Incorporated dba Cousins Industrial Services to Salco Incorporated dba Salco Industrial Services on June 24, 1982.

Management of the company and ownership of the property remained the same after this change.

The land on which Salco Industrial Services is located is leased from:

Roy S. Jones
538 Riverview
Monroe, Michigan 48161

Mr. Jones is not involved in the operation of Salco. He is the property owner, and Salco is buying said property under terms of a land contract.

Neither liquid or solid hazardous wastes, as defined by EPA regulations, are generated, treated or disposed of at this facility

Only limited amounts of Liquid Hazardous Waste, properly labeled and identified, are stored on a temporary basis at this site; in DOT roadworthy 55 gallon metal drums, and in one 3000 gallon hazardous waste tank. The General Manager of Salco Industrial Services has stated that as of June 24, 1983, it is the intention of the company to remove all hazardous waste stored on the site as soon as possible. Such removal shall be under proper manifesting and shipping requirements.

When all such product has been removed, the facility will no longer be used for the storage and transfer of hazardous wastes.

The company will continue in the business of transporting hazardous wastes from generating locations to disposal or storage sites. The company will continue to transport and store non-hazardous waste petroleum products (e.g. waste oils) which are reclaimable or re-refinable.

This report refers to the following documents, which shall become addenda to it:

1. Spill Prevention Control and Countermeasure Plan, dated January 30, 1980 and revised on December 8, 1981, and again on August 1, 1982.
2. Driver Manual/Instructions dated 1980 and updated as needed.
3. Precautionary letters to the local Police and Fire Departments, the local hospital and ambulance service.

WASTE ANALYSIS

This section is required by Part 265.13, Subpart B.

Hazardous wastes are not treated or disposed of at this facility. Those hazardous wastes held in temporary storage at the site shall be logged in only under proper manifest, and only after a waste analysis form for the material has been furnished by the generator.

All copies of the shipping manifests and the Generator Waste Analysis Forms shall become an integral part of the Operations Log. Manifests and Analysis Forms shall be cross referenced for easy availability. All records shall be retained in file for three years.

All hazardous waste that is stored at the site shall be properly described and identified. It shall be placed in containers which meet the requirements of all environmental and safety regulations. The location in which the material is stored shall also meet all safety and environmental requirements. The specific material, type of container, and exact location shall be recorded as part of the operations log. The date the material is put into storage and the date of its removal shall also be a permanent part of the log.

WASTE ANALYSIS PLAN

PARAMETERS FOR ANALYSIS:

Even though all hazardous wastes accepted for temporary storage at Salco's Facility have documented data specifying their composition and characteristics (Generator Waste Analysis forms, Safety Data Sheets, Laboratory Analysis reports, etc.), there can be occasions when additional or confirming analyses are required. Such analyses may be carried out if:

- A. The waste does not conform to the description/analysis shown on the generator's documents, as noted by inspection:
 - 1. Drummed materials documented as solid or sludge are liquid; or vice versa.
 - 2. Drummed or bulk materials documented as aqueous are obviously organic solvents; or vice versa. Noted by odor and physical characteristics.
 - 3. Drummed material being corrosive, but not so documented. Noticed by fumes, corroded/leaking drums, bulging of drums during storage due to gas pressure build-up, pH paper inspection.
 - 4. Drummed or bulk materials documented as nonflammable solvents (FO01) are possibly flammable solvents (FO03, FO04, FO05); or vice versa. Noticed by characteristic solvent odors and by specific gravity measurement.
- B. The waste material is from a generator who has a previous history of misrepresentation; either by design, sloppy waste handling practices, or ignorance of proper waste identification/characterization procedures.
- C. The generator's documented analysis/characterization subsequently turns out to be invalid because:
 - 1. The generator belatedly informs Salco that an error was made, and the documented analysis is not for the material being stored.
 - 2. The generator belatedly informs Salco that the on-going manufacturing process generating the waste had been changed since the date the analysis was made, and the stored waste was generated after that change.
 - 3. The generator belatedly informs Salco that another material had accidentally been mixed with the analyzed waste, and the stored material is this mixture.
 - 4. The date appearing on the analysis document of a waste material from an on-going process may be very old. This could suggest that an updated sample analysis is in order.

- D. Reasons, other than those stated above, for analyzing stored hazardous waste may arise, and can be dealt with on a case by case basis.

The analytical data, physical characteristics data, and other background information necessary to document a waste sufficiently for acceptance at Michigan TSDF Sites are spelled out on the "Waste Characterization Report" and "Generator Waste Analysis Form", shown on following pages 6, 7 and 8.

TEST METHODS:

Salco has a limited analytical testing capability, which includes;

1. Open cup flash point tester
2. Hydrometers for specific gravity determination
3. Centrifuge for phase separation
4. pH measurement by Hydrion paper

In the event that Salco must have samples of stored wastes tested for documentation, the services of the following commercial testing laboratories are utilized:

- A. Biological & Environmental Control Laboratories, Inc.
5330 Heatherdowns Blvd.
Toledo, Ohio 43614
(419) 866-5533
James Kulla Norman Huff

PCB content	Gas chromatography/solvents
Heavy metals content	Corrosivity
EP leachate	Biological tests
Flash point	

B.E.C. Labs' service is quite fast as regards running test and reporting results.

- B. Jones & Henry Laboratories, Inc.
2000 W. Central Avenue
Toledo, Ohio 43606
(419) 473-9611
Fred Doering

PCB content	Gas chromatography/solvents
Heavy metals content	Corrosivity
EP Leachate	Elemental analysis
Flash point	Organic and inorganic analysis

J & H Labs' service is considerably slower than B.E.C.'s.

C. Toledo Testing Laboratory, Inc.
1810 North 12th Street
PO Box 2186
Toledo, Ohio 43603
(419) 241-7175
John Rose

PCB content
Metals content
Flash point
Chemical analysis
Pollution control analysis

SAMPLING:

DRUMS:

A. LIQUID

1. Sample through the 2" bung using a 1½" diameter "olive jar" secured to a 40" rod. Run the jar all the way to the bottom at such a rate that the jar fills up during the descent.
2. Sample through the ¾" or 2" bung using a 40" X ½" glass tube or metal conduit. This will give a "core" sample the depth of the drum.
3. Sample through the ¾" or 2" bung using a suitable length of ⅜" diameter polyethylene tubing, or rubber tubing, as a siphon. Siphoning permits selective sampling of drum contents at selected depths; particularly handy when there are distinct layers (aqueous & non-aqueous) in a container.

B. SLUDGE

1. Open top drum; scoop out with a suitable sampler. A 40" X ⅜" conduit may be used as a coring sampler.
2. Closed top drum; sample through a bung using a 40" X ⅜" conduit as a coring sampler.

TANK #6 and TANK TRUCKS:

- A. These vessels may be sampled through top access ports in the same manner that the drums containing liquid are sampled. The sampling tools would be up-sized to accommodate the larger vessel's dimensions.
- B. These vessels are sampled with a suitable jar attached to a line. This at best is a make-do method.
- C. The material in the very bottom of the tank truck may be sampled by cracking the bottom drain valve and collecting the material in a clean bucket. The first bucketfull is discarded, since it assumed to be contaminated by material left in the valve and piping from the material previously in the tank truck.

STATE OF MICHIGAN
DEPARTMENT OF NATURAL RESOURCES
OFFICE OF HAZARDOUS WASTE MANAGEMENT
BOX 30038
LANSING, MICHIGAN 48909

WASTE CHARACTERIZATION REPORT

SECTION A. WASTE GENERATOR IDENTIFICATION INFORMATION

EPA IDENTIFICATION NUMBER

BUSINESS NAME

ADDRESS

CITY

STATE

ZIP CODE

NAME AND TITLE OF CONTACT PERSON

TELEPHONE NUMBER

SECTION B. COMMON NAME OF THE WASTE

ENTER TYPE OF WASTE (i.e. common name) characterized on this form and the source or process from which it was produced.

SECTION C. LISTED HAZARDOUS WASTE

1. If the waste is listed in tables 301 a, b, c, or d of Rule 299.6308, 299.6309, 299.6310 or 299.6311, respectively or table 305 of Rule 299.6317, enter the hazardous waste number from the appropriate table
2. If the waste is a discarded commercial chemical product, off-specification specie, container or spill residue of a substance listed in Table 302a, Rule 299.6312, or Table 302 b or c, Rule 299.6313 or 299.6314, respectively, enter the hazardous waste number from the applicable table
3. If waste contains any substances listed in table 302 a, b, or c, Rule 299.6312, 299.6313, or 299.6314, respectively, enter their hazardous waste number(s) from the applicable table AND record the component concentrations.
4. If the waste contains viable disease-causing agents listed in table 304, Rule 299.6316, enter the hazardous waste number(s) from the table

HAZARDOUS
WASTE NO.

COMPONENT
CONCENTRATION

_____ to _____ %
_____ to _____ %
_____ to _____ %

SECTION D. HAZARDOUS WASTE BASED ON CHARACTERISTICS

5. Ignitable Wastes

5a. Liquid flash point test (aqueous solutions containing less than 24% alcohol by volume are excluded from this test).

Test Results

Parameters

Reference

_____ to _____ °C

Flash Pt. 60°C

299.6201 (c) (i)

5b. Non-liquid — Is it ignitable based on conditions stated in the reference?

☐ Yes ☐ No

See Reference

299.6201 (c) (ii)

5c. Compressed gas — Is the waste a flammable compressed gas as defined in the reference?

☐ Yes ☐ No

See Reference

49 CFR § 173.300

5d. Oxidizer — Is the waste an oxidizer as defined in the reference?

☐ Yes ☐ No

See Reference

49 CFR § 173.151

5e. Enter "D001", as the hazardous waste number if the waste exceeds one or more of the parameters listed or meets the definition of a hazardous waste based on the reference

6. Corrosive Wastes (concentrated salt solutions are by definition not corrosive)

6a. Aqueous Solution — pH test

_____ pH

See Reference

299.6201 (a) (i)

6b. Liquid-Steel (type SAE 1020) corrosion test

_____ mm/yr

Rate 6.35 mm/yr

299.6201 (a) (ii)

6c. Albino rabbit skin test — Is the tissue destroyed or irreversibly changed?

☐ Yes ☐ No

See Reference

299.6201 (a) (iii) &
49 CFR § 173.240

6d. Enter "D002", as the hazardous waste number if the waste exceeds one or more of the parameters listed

7. Reactive wastes

7a. Is the waste normally unstable and capable of undergoing violent chemical or physical change without detonating?

☐ Yes ☐ No

7b. Does it react with water forming potentially explosive mixtures with water?

☐ Yes ☐ No

7c. When mixed with water, does it generate toxic gases, vapors, or fumes?

☐ Yes ☐ No

7d. Is it a sulfide or cyanide bearing waste which when exposed to pH conditions between 2 and 12.5, can generate toxic gasses, vapors, or fumes?

☐ Yes ☐ No

7e. Is the waste capable of detonation or explosive reaction when subjected to a strong initiating source or if heated under confinement?

☐ Yes ☐ No

7f. Is the waste capable of detonation or explosive decomposition or reaction at standard temperature and pressure? ☐ Yes ☐ No

7g. Is the waste a forbidden explosive as defined in 49 CFR § 173.51? ☐ Yes ☐ No

7h. Is the waste a Class A explosive as defined in 49 CFR § 173.53? ☐ Yes ☐ No

7i. Is the waste a Class B explosive as defined in 49 CFR § 173.88? ☐ Yes ☐ No

7j. If the answer to any of the questions 7a through 7i is yes, enter "D003", as the hazardous waste number. ☐ Yes ☐ No

8. EPA Toxic Wastes — Upon obtaining an extract of the waste as described on 40 CFR § 261, Appendix II, test for the components listed in Table 303, Rule 299.6315. For each component material that exceeds the extract concentration listed in the table, enter the hazardous waste number(s) and the tested concentration(s):

Hazardous Waste No.	Concentration
<input type="checkbox"/>	mg/
<input type="checkbox"/>	mg/
<input type="checkbox"/>	mg/
<input type="checkbox"/>	mg/

SECTION E. PHYSICAL STATE AT 25°

9. What is the average density of the material? _____

10. Solids: Does the material produce dust if exposed to air movement? ☐ Yes ☐ No

11. Liquid — Sludge: What is the percent solids? _____

Do the solids settle out? ☐ Yes ☐ No

Can the material be pumped? ☐ Yes ☐ No

Can the material be poured? ☐ Yes ☐ No

12. Liquid: At what temperature does it freeze? _____

13. Gases: What is the maximum pressure of the container? _____ PSI

SECTION F. OTHER INFORMATION:

14. What is the maximum quantity of this waste that is generated per month? _____ kg

15. If the only hazardous waste numbers listed on this form are the numbers that have been entered for Item 3, enter the numbers in the space provided if the component concentration (Item 3) and the quantity of the waste generated (Item 14) cause the waste to be considered as a notification waste based on R 299.6201 (1) (g) (iii) and (iv), figure A of R299.6201(2), or figure B of R299.6201 (3):

NOTE: If the hazardous waste numbers that have been entered under Item 3, begin with the letter "P" use figure A to determine if it is a notification waste. If the number begins or ends with the letter "U" use figure B.

16. Are the hazardous wastes listed on this form disposed of onsite? ☐ Yes ☐ No

17. If the waste is a hazardous waste, is it exempt under the small quantity exemptions pursuant to R 299.6203(2) and (3)? ☐ Yes ☐ No

18. If tests were conducted in the evaluation of the waste, all of the following information shall be transmitted to the Department of Natural Resources with the waste characterization Record:

(a) The sampling procedure and the reasons for determining that the sample is representative of the waste.

(b) The results of all tests conducted.

(c) The accuracy and precision of any test conducted.

SECTION G. U.S. DEPT. OF TRANSPORTATION REPORTING REQUIREMENTS

Hazardous Materials Description and Shipping Name _____

Hazard Class _____ UN/DA ID No. _____

Special Handling and Shipping Requirements _____

If the waste is hazardous and not exempt or excluded from management, or is a notification waste, send the completed form to the Department of Natural Resources, Office of Hazardous Waste Management, P.O. Box 30038, Lansing, MI 48909.

Signature _____

Title _____

Date _____

GENERATOR WASTE ANALYSIS FORM

LOG NO. _____

WASTE GENERATOR GENERATOR NO. _____
Name: _____
Address: _____
City: _____ Zip: _____
Phone: _____ Date: _____
Contact Person: _____
Signature: _____

WASTE HAULER *HAULER NO. _____
Co. Name: _____
Address: _____
City: _____ Zip: _____

DISPOSAL METHOD & FACILITY TO BE USED

☐ Incineration ☐ Landfill ☐ Reclaimed
☐ Other (explain): _____

FACILITY NO: _____ Tel: _____
Name: _____
Address: _____
City: _____ Zip: _____

PHYSICAL STATE @ 25°C

- ☐ Solid: Dusting hazard if containers are opened? _____
☐ Liquid/Sludges: _____ % solid _____ pH
Waste can be pumped? _____ poured? _____
☐ Liquid/Solid Phases: _____ % solid
_____ % free flowing liquid layer
☐ Gases: Pressure of container _____ PSIG
_____ EP Leachate extraction attached.
_____ Flammable: _____ Flash Point. _____ pH
_____ Chemically reactive _____
_____ Toxic _____ Corrosive _____ Irritant
_____ Odor _____ Explosive _____ Infectious
_____ Volatility (if greater than acetone)
Other: _____

GENERAL DESCRIPTION OF WASTE AND PROCESS
GENERATING WASTE

VOLUME OF WASTE MATERIAL & CONTAINMENT

_____ Gallons _____ Cubic yards. Container:
_____ bulk. Other _____

HAULED: _____ times per _____ week _____ month
_____ year. _____ Only hauled once.

IDENTIFY MAJOR COMPONENTS: 1% (10,000 mg/kg) or greater of waste content. Total major and minor components must add up to 100%.

Compound or Element	Concentration
_____	_____
_____	_____
_____	_____

MINOR COMPONENTS: Concentration in mg/kg, mg, or ppm, of waste content (Element and/or Compound).

INORGANIC METALS:	
5. _____	Mercury
1. _____ Lead	6. _____ Beryllium
2. _____ Zinc	7. _____ Cadmium
3. _____ Nickel	8. _____ Trivalent Chromium
4. _____ Copper	9. _____ Hexavalent Chromium

INORGANIC NON-METALS:	
10. _____ Chlorine	13. _____ Phosphorus
11. _____ Bromine	14. _____ Sulfur
12. _____ Arsenic	15. _____ Cyanide
16. _____	Noncombustible Ash

DOES THE WASTE MATERIAL CONTAIN ANY OF THE FOLLOWING:

Class of Compound	Yes	No
16. Halogenated aromatics (e.g. PCB, PBB)	_____	_____
17. Other Halogenated organics	_____	_____
18. Aromatic Amines	_____	_____
19. Pesticides	_____	_____
20. Aromatic Ureas or Thioureas	_____	_____
21. Cyclic Nitrogen (toxic) (e.g. Pyridine)	_____	_____
22. Phenols, to include nitro & halogenated phenols & salt	_____	_____
23. Quinones	_____	_____
24. Phosphorus compounds (e.g. phosphates)	_____	_____
25. Polycyclic organics	_____	_____
26. Asbestos	_____	_____
27. Any other material listed on Mi. Critical Materials Reg.	_____	_____

NOTE:

State what methods were utilized to derive the data for major and minor compounds (Analysis, Material Balance, etc...).

INDICATE THE SPECIFIC NAME AND CONCENTRATION FOR THE COMPOUND(S) IN EACH CLASS LISTED ABOVE (16-27) THAT HAVE A CONCENTRATION LESS THAN 1%.

Compound	Concentration (mg/kg)
_____	_____
_____	_____
_____	_____

SECURITY

This section is required by Part 265.14, Subpart B.

The security arrangements are addressed in depth under the heading "Surveillance", page 16, SPCC Plan, attached.

Signs, bearing the legend "Danger - Unauthorized Personnel Keep Out" are posted at all entrances to the site.

GENERAL INSPECTION REQUIREMENTS

This section is required by Part 265.15, Subpart B.

The storage facility for hazardous wastes at the site is limited to three areas:

1. Inside the warehouse; drums of compatible nonflammable wastes. The floor is concrete and contains no drains. It is anticipated that no more than 40 drums shall be placed in this area.
2. Out of doors bermed area; flammable wastes in drums and on occasion in a 300 gallon DOT portable container. It is anticipated that no more than 100 drums shall be stored in this area.
3. Tank number 6; a 3000 gallon steel tank within the diked area. This tank has no bottom valves. All loading and unloading is done through a cappable pipe on top.

All hazardous wastes stored in the same areas are compatible.

The drums and DOT container shall be properly labeled and identified, and their general condition shall meet minimum DOT requirements. The storage areas shall be carefully inspected each day.

The designated bermed hazardous waste storage area is 50 feet south of the building and 50 feet west of the east fenceline. The basin floor of the area has a compacted clay seal cap. It is enclosed by a compacted clay berm that has a minimum height of twelve inches and is three feet wide at its base. A compacted clay ramp across the north berm provides vehicle access to the area.

See Site Plan, Page 11 and "Facility Description", Page 8, SPCC Plan, attached.

The areas with drums containing hazardous wastes shall be monitored on a daily basis. All drums shall be carefully inspected. If there is evidence of corrosion or leakage, the contents of the drum in question must be transferred immediately to another properly certified drum. This also applies to a DOT portable container.

An Inspection Report must be prepared and signed and become an integral part of the Company Operation Log each week. Careful inventory control must be maintained of all drums and their contents.

See Copy, Inspection Report, Page 12.

The Inspection Report must indicate the date and time of the inspection, observations made, and the date and nature of any remedial action which was taken. All inspection reports, properly signed, must become part of the operation log and must be kept at the facility for a minimum of three years.

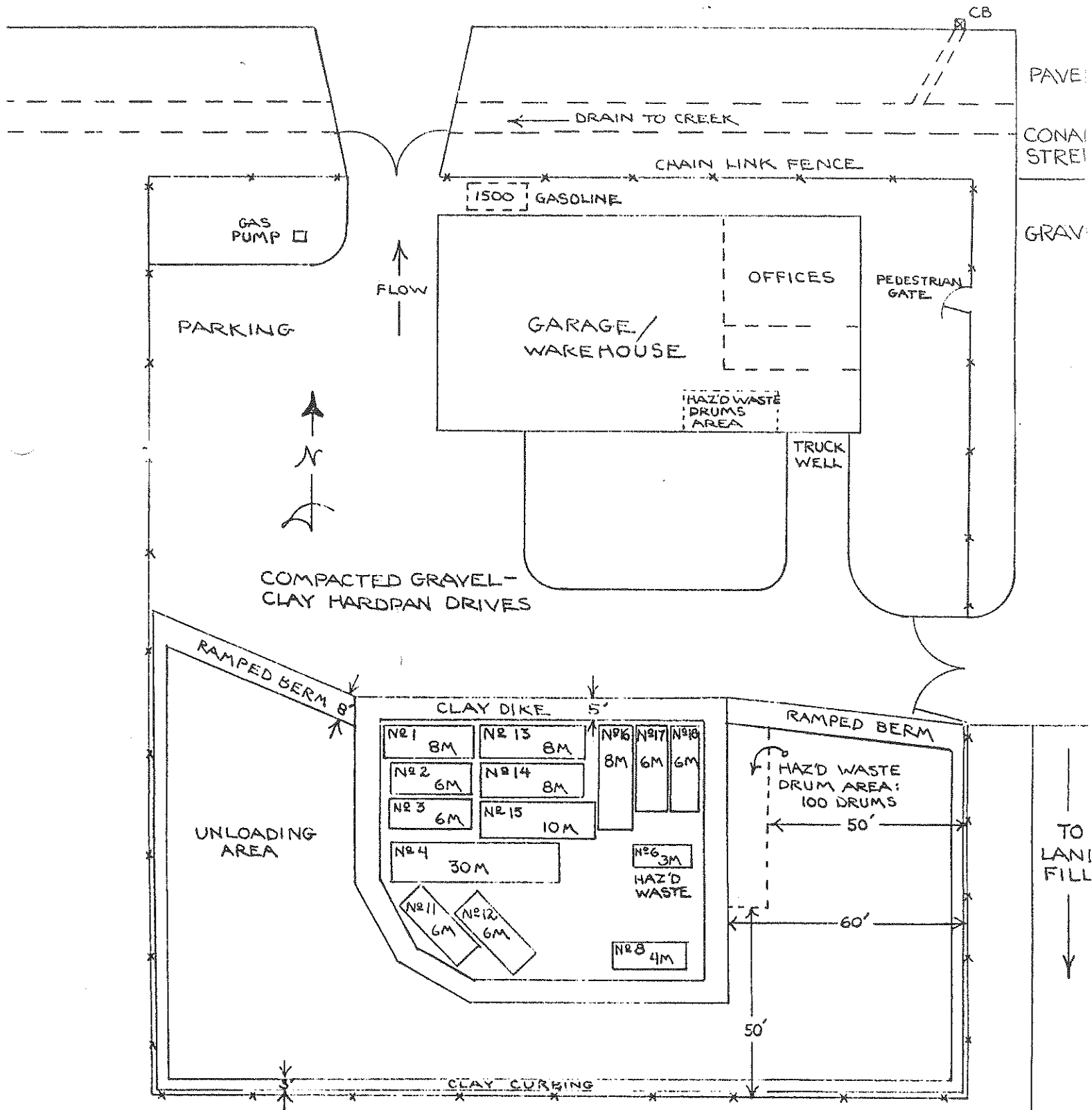
Monitoring equipment, such as tank leak detectors or tank water detectors or high level tank alarms are not required at this site.

Fire extinguishers and alarm systems are inspected and monitored on a regular basis. First aid equipment, including eye wash material, is inspected regularly.

Breathing equipment, protective clothing, and Spill Control Equipment, as required by the SPCC Plan, shall be inspected for readiness on a regular basis.

Tools and earth moving equipment shall be monitored as needed. When the facility is closed for the day, security alarm systems are placed in operation.

WOOD STREET (CONCRETE PAVE)



INSPECTION REPORT

Notice to Inspector: This is a requirement of the USEPA. It must be carefully completed on a regular schedule each week. It shall then become part of the Company Log and remain on file for three years after completion. THIS INSPECTION REPORT MUST BE SIGNED, DATED, AND TIME OF INSPECTION NOTED!

HAZARDOUS WASTE STORAGE AREA

Drums

1. Number stored in bermed yard area _____
2. Number stored in warehouse _____
3. All identified as to generator & contents YES ___ NO ___
4. All properly placarded YES ___ NO ___
5. Evidence of leakage or corrosion YES ___ NO ___
6. Lids and bungs tight YES ___ NO ___

Tank No. 6

7. Liquid volume: manually gauged inches _____ gallons _____
8. Evidence of leakage or corrosion YES ___ NO ___

Need for remedial action

YES ___ NO ___

State action taken:

GENERAL

9. Fire extinguishers in place YES ___ NO ___
10. Spill control materials & equipment on site YES ___ NO ___
11. Area lights, alarm system, communications equipment in working order YES ___ NO ___
12. Dike and berms in good condition YES ___ NO ___
13. Fence and gates in good condition YES ___ NO ___

Need for remedial action

YES ___ NO ___

State action taken:

SIGNED _____ TIME _____ DATE _____
Inspector

PERSONNEL TRAINING

This section is required by Part 265.16, Subpart B.

The General Manager of Salco, Incorporated is also the designated Environmental Coordinator for the facility. His qualifications are addressed in the SPCC Plan. He is in charge of the day-to-day hazardous waste storage and control program at the facility.

The Environmental Coordinator has given extensive on-the-job training to all "general employees" and mechanics at the site. This training enables all employees to perform their duties in a way which insures that compliance regulations are met.

In addition, all mechanics and "general employees" shall attend qualified training and educational seminars on Hazardous Waste Handling and Safety and Environmental Protection.

Listed below are all employees, their job experience, training, and job description and date of employment.

All company personnel who are involved in the transfer and storage of hazardous liquid wastes or petroleum based products shall be familiar with the requirements of the Salco SPCC Plan; specifically those requirements found in sections entitled Spill Clean Up Control, Product Transfer Procedures, and Spill Prevention Protection, pages 14 through 16.

All training records of personnel actively employed shall be kept as long as they work or until closure of the facility. When a person is no longer employed at the facility, his records must still be kept on file for a minimum of three years from the date of termination of employment.

The Environmental Coordinator shall review this Report, and all addenda, including the SPCC Plan, at least once each year. Further, he shall conduct yearly reviews of all necessary training procedures with all personnel who are involved in the transfer or storage of hazardous wastes.

In the fall of 1983 (circa October) Michigan State University intends to hold one of their Hazardous Waste Training Programs in Birmingham, Michigan. Per Dr. Lynn Corson, the subjects covered will include safety and health hazards associated with working with hazardous wastes, workplace hazards recognition, fire prevention & protection, and other subjects to be decided. Salco will be sending personnel to this seminar.

7/10, /

EMPLOYEE TRAINING REPORT

1. PAUL FULNER, Mechanic
SS# 368-24-9390
1447 Stacy
Canton, Michigan 48188
Employment starting date: October 1980
Received extensive on-the-job training from General Manager.
Reviewed in 1983.
2. JOHN FORSYTHE, General Employee
SS# 373-72-0312
21301 Beech Daly Road
Flat Rock, Michigan 48134
Employment starting date: May 9, 1983
Receiving extensive on-the-job training from General Manager.
Will attend formal classes in Environmental Protection and
Safety in the near future.
3. GORLAND PATERFRITZ, General Employee
SS# 367-60-7064
29 Milton
Monroe, Michigan 48161
Employment starting date: June 10, 1981
Received extensive on-the-job training from General Manager.
Reviewed in 1983.
4. DAVID SHIPE, General Employee
SS# 367-60-3618
3230 Sheick Road
Monroe, Michigan 48161
Employment starting date: March 30, 1981
Temporarily laid off: June 14, 1983
Received extensive on-the-job training from General Manager.
Reviewed in 1983.
5. MARY GILLESPIE, Secretary
SS# 376-44-4208
Garden City, Michigan 48135
Employment starting date: December 6, 1982
Secretary is familiar with requirements of SPCC Plan and
Contingency Plan.

NOTE: General Employees drive and service vehicles, do minor
repair work on them, load and unload material, and
work in the Salco yard.

SPECIAL REQUIREMENTS FOR THE STORAGE OF IGNITABLE, REACTIVE OR
INCOMPATIBLE WASTES

This section is required by Part 265.17, Subpart B.

Hazardous wastes which are incompatible shall not be stored in the same general area. Further, the areas for storage of hazardous wastes shall be separated from those locations at the site which contain ignitable or reactive material.

All hazardous waste containers shall receive special handling and placarding as needed.

"No smoking" signs shall be placed in all hazardous waste storage areas, and throughout the entire bulk storage and transfer areas for petroleum based products.

Flammable (D001) wastes are stored out of doors; bulk quantities in tank number 6 within the dike, and drums & DOT portable 300-gallon containers within the bermed area.

SUBPART C - PREPAREDNESS AND PREVENTION

The Maintenance and Operation of the facility is addressed by Part 265.31, Subpart C.

The facility is maintained and operated to minimize the possibility of a fire, explosion, or any unplanned sudden or non-sudden release of hazardous waste constituents to air, soil or surface and ground water, which could threaten human health or the environment.

The company makes a concerted effort to comply with all MIOSHA regulations, and with the Michigan Flammable Liquids Code as administered by the State Fire Marshall.

The methods used to assure compliance are outlined in the company Spill Prevention Control and Countermeasure Plan.

Required communications and safety equipment at the site is addressed by Part 265.32, Subpart C.

The company has an internal telephone and loudspeaker communications system which can be used to provide immediate emergency instructions throughout the compact site as necessary.

Fire control equipment, including portable fire extinguishers, are on site. These are inspected regularly by appropriate authorities.

The type, amount and location of Spill Control Equipment at the site is addressed by the attached SPCC Plan.

Decontamination equipment such as special eye wash solutions are maintained in inventory at the first aid station at the plant. Water hose and outlets are readily available for washing down contaminated clothing or equipment.

An excellent volume of water, provided by the Monroe City water system is available at the plant. Excellent water pressure is maintained.

Required Testing and Maintenance Procedures for Emergency Equipment is addressed by Part 265.33, Subpart C.

The General Manager has established testing and maintenance procedures for emergency equipment. Communications equipment is tested each day.

Fire extinguishers are checked every three months by Union Fire Services.

All emergency equipment is maintained in operable condition.

Immediate access is provided to all alarm and communications systems. There is adequate space to maneuver vehicles at the locations where hazardous wastes are stored.

Arrangements have been made to familiarize police, fire, local hospital, and ambulance personnel with the locations and access routes to the hazardous wastes.

Notification letters have been sent to the local fire department, police department, and hospital indicating what materials are being stored and some of the problems which could occur should there be a release of hazardous material at the site.

Copies of these letters are found in the addendum.

SUBPART D - CONTINGENCY PLAN

The SPCC Plan, an addendum to this report, provides many of the provisions needed for a workable Contingency Plan for this site. Additional provisions to the Contingency Plan, incorporating hazardous waste management provisions are noted as follows:

The on-scene commander of a petroleum or hazardous waste spill clean-up shall be the Plant Emergency Coordinator.

Should a spill of hazardous waste liquid material occur while it is in storage in drums, or while the drums are being delivered to or removed from the site, sorbent material, oil dry, or chemical absorption powder, and miscellaneous tools, vacuum equipment and rolling stock shall be immediately deployed as needed by trained personnel at the spill location.

Great care and effort shall be made to prevent spillage from contaminating the soils, surface waters and ground waters. In the event of a spill, fire, explosion or unplanned release of hazardous wastes, the Michigan Department of Natural Resources and the United States Environmental Protection Agency (National Response Center) shall be immediately notified, as indicated in the SPCC Plan.

ACTIONS TO TAKE IN CASE OF OIL OR CHEMICAL SPILL OR
SPILLAGE OF HAZARDOUS WASTES

FIRST: Treat all spilled chemicals as hazardous until proven otherwise.

- A. Consider it flammable - prevent any source from possibly igniting chemicals or vapors; e.g. - smoking, electric motors, sparks electrical equipment.
- B. Consider it corrosive and/or toxic - avoid contact with skin and eyes. Avoid walking in it unless absolutely necessary.

SECOND: Contain the spill.

- A. Use shovels to dam the area.
- B. Use sorbent pads to absorb spilled material.
- C. Prevent chemicals from contacting other chemicals.

THIRD: Contact one of the people listed.

Frank Fulner	Home:	(313) 243-2820
General Manager and	Business:	(313) 243-2820
Environmental Coordinator		
739 Washington Street		
Apt 112		
Monroe, MI 48161		

Paul Fulner, Mechanic	Home:	(313) 397-0905
1447 Stacy	Business:	(313) 243-2820
Canton, MI 48188		

Mary Gillespie, Secretary	Home:	(313) 397-0905
5743 Harrison	Business:	(313) 243-2820
Garden City, MI 48135		

FOURTH: Clean up spill.

- A. Use proper protective clothing - rubber boots, chemical goggles, coveralls, rubber gloves.
- B. Place soaked up material in approved drums.

ACTIONS TO TAKE IN CASE OF FIRE, EXPLOSION OR RELEASE
OF TOXIC OR NOXIOUS FUMES

FIRST: Immediately sound the alarm.

- A. Shut down all activity.
- B. Evacuate facility.
- C. Notify fire department, police, hospital and ambulance as needed:

FIRE STATION No. 2	Emergency	911
1330 E. First at Conant	Non-emergency	243-6850

POLICE DEPARTMENT	Emergency	911
120 S. Macomb	Non-emergency	241-3300

MERCY-MEMORIAL HOSPITAL	241-1700
718 N. Macomb	

EMTS AMBULANCE SERVICE	Emergency	241-1111
1185 W. Front	Non-emergency	242-8000

SECOND: Emergency Coordinator should;

- A. Ascertain conditions at site.
- B. Direct the effort to contain fire or release of hazardous material.
- C. Remain in area to assist Fire Department Personnel and answer questions they may have.
- D. Remove injured or disabled personnel to Mercy-Memorial Hospital.

THIRD: Contact EPA and DNR as soon as possible. Provide the following information;

- A. Name and telephone number of emergency coordinator.
- B. Name and address of the facility.
- C. If fire or hazardous release, state time and type of accident.
- D. Identify material involved and the volume.
- E. Extent of injuries, if any.
- F. State hazards to humans and environment.

FOURTH: Clean up after release.

- A. Check unaffected areas of site for damage or leaks.
- B. Clean all safety equipment and replace in working order.
- C. File all necessary reports and complete log describing the event.

The Emergency Coordinator for the facility is identified in this report. Frank Fulner is the general manager of the plant. His background is described in the SPCC Plan and he is familiar with all aspects of the operation at the site and emergency procedures. He is highly proficient in oil spill prevention and clean-up techniques. He has the authority to carry out the provisions of this Contingency Plan.

There have been no emergency situations at the facility which were created by spillage, fire, explosion or release of hazardous material.

SUBPART E - MANIFESTS, RECORDS AND REPORTING

Use of a Manifest System is addressed by Part 265.71, Subpart E.

The facility correctly follows the procedures listed in this part of the regulations in processing each manifest. Special effort is made to assure that a copy of the signed manifest is returned to the generator within 30 days after delivery.

All manifest records are retained in file for three years.

Great care is given to meeting the requirements of Part 265.72 regarding discrepancies in manifesting as to weight or content on all waste received from outside sources.

Maintenance and Use of an Operating Record is addressed by Part 265.73, Subpart E.

An Operating Record shall be maintained at the site. This record shall show the receiving date of each waste, its description and quantity, its storage location and date it was shipped from the facility.

The HAZARDOUS WASTE STORAGE RECORD log sheets have the following column headings for information to be entered:

1. GENERATOR
2. MANIFEST No.
3. MATERIAL
 - a. EPA (EPA hazardous waste number)
 - b. NAME (chemical, DOT, or common name)
 - c. FORM (liquid, solid, sludge)
4. CONTAINER
 - a. NO. (quantity)
 - b. TYPE (coded; DR, CT, T, PT)
 - c. VOL (coded; G, Y, P)
5. STORAGE
 - a. CODE (S01, S02)
 - b. LOCATION (in building, bermed yard, tank #6)
6. DATE IN
7. DATE OUT
8. TSDF (destination)

A sample page from the Hazardous Waste Storage Record Log is shown on the next page.

The waste analysis form shall be part of the log as long as the given material is in storage. Inspection reports shall be made an integral part of the log.

GENERATOR	MANIFEST No.	MATERIAL			CONTAINER			STORAGE			DATE IN	DATE OUT	TSDF
		EPA	NAME	FORM	NO.	TYPE	VOL	CODE	LOCATION				
• Gould	26164	D007	CHROME & CAUSTIC	SLUDGE	11	DR	605 G	SO1	IN BUILDING		7/25/80	8/5/80	Nelson
• Gould	26167	D002	CAUSTIC	LQ.	12	DR	660 G	SO1	IN BUILDING		7/25/80	8/5/80	Nelson
• Ransom & Randolph	78305	D007	SPENT PHOS. ACID W/ CHROME	LQ.	4	DR	90 G	SO1	IN BUILDING		8/21/80	9/12/80	"
• GULD	26163	D001	XYLENE, MEK, CHLOROTHANE	LQ.	13	DR	715 G	SO1	IN BERMED YARD		9/19/80	10/31/80	LQ. DISP.
• GULD	78321	F002	1,1,1-TRICHLOROETHANE	LQ.	1	DR	55 G	SO1	IN BUILDING		12/18/80	6/24/81	S.M. Wilson
1980													
1981													
• Gould	78320	D001	XYLENE, MEK, CHLOROTHANE	LQ.	30	DR	1650 G	SO1	IN BERMED YARD		2/24/81	3/16/81	Lq. Disp.
• Kaiser Alum	120044	D001	MIXED FLAMMABLE SOLVENT (WASH)	LQ.	72	DR	3500 G	SO1	IN BERMED YARD		3/26/81	4/8/81	Lq. Disp.
(DRUMS PUMPED INTO VACUUM TRUCK FOR BULK TRANSPORTATION TO DISPOSAL SITE)													
• Gould	120080	D007	SLUDGE CONTAINING 670% CHROME	SLUDGE	22	DR	1200 G	SO1	IN BUILDING		4/2/81	5/13/81	Nelson
• Gould	104236	D002	CAUSTIC	LQ.	6	DR	330 G	SO1	IN BUILDING		4/2/81	5/13/81	Nelson
• U.S. Gypsum	MI-0023607	U220	Toluene	liq	4	DR	220 G	SO1	IN BERMED YARD		4/20/81	5/13/81	LQ. DISP.
• CHAMPAIGN	MI-0023720	D001	FLAMMABLE SOLVENT	liq	1	CT	600 G				5/5/81		STORAGE: COUSINS
TRANSFERRED TO DOT. PORTABLE TANKS 2 PT → SO1 IN BERMED YARD													
• Kaiser Alum	MI-0011729	F017	WASTE RESIDUE FROM INDUSTRIAL PAINTING	liq	73	DR	2700 G	SO1	IN BERMED YARD		6/5/81		LQ. DISP.
(DRUMS PUMPED INTO VACUUM TRUCK FOR BULK TRANSPORTATION TO DISPOSAL SITE)													
• STROH	MI-0016978	D001	WASTE FLAMMABLE SOLVENTS	LQ.	34	DR	1800 G	SO1	IN BERMED YARD		6/22/81		LQ. DISP.
TRANSFERRED TO CT FOR TRANSPORT TO & ACCEPTANCE BY THE DISPOSAL SITE													
• COUSINS	MI-0016957	K061	BAG HOUSE DUST Pb & Cd	SOLID	1	T	21060	SO2	METAL RECTANGULAR TANK IN BERM AREA		7/17/81		C-MET
• ABITIBI	MI-0017118	D001	Xylene, Butyl Acetate, Alcohol, Chloroacetic Acid	liq	1	CT	300 G	SO1	IN BERMED YARD		7/27/81	7/27/81	STORAGE: COUSINS
STORED IN PORTABLE DOT "TANK"													

(NOTE! LIQUID DISPOSAL WAS "DOWN" FOR REPAIRS FOR A PROLONGED PERIOD. STARTED UP AGAIN, AND DO NOT WANT DRUMMED WASTE; ONLY BULK)

1980
1981

• Gould	78320	D001	XYLENE, MEK, CHLOROTHALENE MIXED FLAMMABLE SOLVENT (WASH)	HQ	30	DR	1650 G	SO1	IN BERMED YARD	2/24/81	3/16/81	Liq. Disp.
• Kaiser Alum (DRUMS PUMPED INTO VACUUM TRUCK FOR BULK TRANSPORTATION TO DISPOSAL SITE)	120044	D001		HQ	72	DR	3500 G	SO1	IN BERMED YARD	3/26/81	4/8/81	Liq Disp
• Gould	120080	D007	MUDGE CONTAINING 6-10% CHROME	MUDGE	22	DR	1210 G	SO1	IN BUILDING	4/2/81	5/13/81	Nelson
• Gould	104236	D002	CAUSTIC	HQ	6	DR	330 G	SO1	IN BUILDING	4/2/81	5/13/81	Nelson
• U.S. Gypsum	MI-0023607	U220	Toluene FLAMMABLE SOLVENT	liq	4	DR	220 G	SO1	IN BERMED YARD	4/20/81	5/13/81	Liq. DISP.
• CHAMPION/ Unterdue REMANIFESTED (COUSINS)	MI-0023720	D001		liq	1	CT	600 G	SO1	IN BERMED YARD	5/5/81		STORAGE! COUSINS
	MI-0023784		TRANSFERRED TO DOT. PORTABLE TANKS 2 PT								5/17/81	Liq. DISP.
• KAISER ALUM (DRUMS PUMPED INTO VACUUM TRUCK FOR BULK TRANSPORTATION TO DISPOSAL SITE)	MI-0011729	F017	WASTE RESIDUE FROM INDUSTRIAL PAINTING	liq	73	DR	2700 G	SO1	IN BERMED YARD	6/5/81		
REMANIFESTED (COUSINS)	MI-0017150										8/3/81	Liq. DISP.
• STROH TRANSFERRED TO CT FOR TRANSPORT TO & ACCEPTANCE BY THE DISPOSAL SITE	MI-0016978	D001	WASTE FLAMMABLE SOLVENTS	HQ	34	DR	1800 G	SO1	IN BERMED YARD	6/22/81		
REMANIFESTED	MI-0088668										10/13/81	Liq. DISP.
(NOTE! LIQUID DISPOSAL WAS "DOWN" FOR REPAIRS FOR A PROLONGED PERIOD. STARTED UP AGAIN, AND DO NOT WANT DRUMMED WASTE; ONLY BULK)												
• COUSINS	MI-0016957	K061	BAG HOUSE DUST Pb & Cr	SND	1	T	21060	SO2	METAL RECTANGULAR TANK IN BERM AREA		7/17/81	C-MET
• ABITIBI	MI-0017118	D001	Aylene, Butyl Cellulose Alcohol, Cellulose Acetate	liq	1	CT	300 G	SO1	IN BERMED YARD	7/27/81	7/27/81	STORAGE! COUSINS
REMANIFESTED (COUSINS)	MI-0088552		STORED IN PORTABLE DOT. "TANK"								9/17/81	U.S. CITEM
• BALL METAL	MI-0088501	F005	Flammable solvent	liq	1	CT	3000 G	SO2	TANK #6	8/17/81	9/21/81	ERIE COAT.
• PREFINISH MET.	MI-0088419	F003	MEK & MIBK	liq	12	DR	650 G	SO1	IN BERMED YARD	8/24/81	9/8/81	U.S. CHEM
• PREFINISH MET.	MI-0088507	F003	FLAMMABLE SOLVENT	liq	20	DR	1075 G	SO1	IN BERMED YARD	9/9/81	9/16/81	U.S. CHEM
• Gould	MI-0059106	D007	WASTE CHROMIC ACID SOLUTION	liq	3	DR	165 G	SO1	IN BUILDING	9/28/81	11/23/81	NELSON
• STROH	MI-0088762	D001	FLAMMABLE SOLVENT	HQ	19	DR	980 G	SO1	BERMED YARD	11/3/81	11/18/81	U.S. CHEM
• Imperial Clute (Gould)	MI-0059103	D002	SODIUM HYDROXIDE SOLUTION	HQ	3	DR	165 G	SO1	IN BUILDING	11/20/81	12/10/81	Nelson
• Imperial Clute	MI-0059107	D007	CHROMIC ACID SOLUTION	HQ	3	DR	165 G	SO1	IN BUILDING	11/20/81	12/10/81	Nelson

SUBPART G - CLOSURE

A Closure Plan for the facility was prepared and posted on the premises on May 19, 1981. This Plan includes cost estimates for the closure requirements for the facility.

A revised copy of the Closure Plan is below. This Plan is available for inspection. It includes a schedule of closure activities.

The Plan specifies the amount of waste to be stored and the capabilities of the site for storage. It does not estimate the year the site will be closed.

CLOSURE PLAN

- Salco
704 Conant Street
Monroe, Michigan 48161
MID000722728
Supercedes Closure Plan 5/19/81

This Closure Plan is to be posted in accordance with RCRA for Salco, Incorporated dba Salco Industrial Services hazardous waste storage facility.

TYPES OF WASTES STORED TEMPORARILY

A. FLAMMABLE SOLVENTS AND PAINT WASH

These will be taken to various solvent reclamation facilities, if reclaimable; U.S. Chemical Co., Inc., Roseville, MI, Chemical Recovery Systems, Romulus, MI, or other suitable facilities.

If the waste is evaluated as economically unsuited for reclamation, it will be disposed of by incineration at a suitable facility; Ross Incineration Services, Inc., Grafton, OH, General Portland Inc., Paulding, OH.

B. PLATING WASTES, ACIDS, CAUSTICS

These types of materials will be disposed of at Nelson Industrial Services, Detroit, MI, Chem-Met Services, Wyandotte, MI, Michigan Disposal, Inc., Belleville, MI, or other suitable facilities.

C. HALOGENATED SOLVENTS

These will be taken to various solvent reclamation facilities if reclaimable; sites listed in A. above, Chemtron Corporation, Avon, OH, Chemical Solvents, Inc., Cleveland, OH, or other suitable facilities.

If the waste is evaluated as economically unsuited for reclamation, it will be disposed of by incineration at sites listed in A. above.

GENERAL CONDITIONS OF TEMPORARY STORAGE

- A. All drums and DOT portable containers will be labeled, and location on the site logged.
- B. In most cases, the hazardous waste will have a pre-designated disposal site.
- C. There should never be more than 150 drums, or total of 12,000 gallons (including tank #6 and any DOT portable containers being used) on the site at any one time. At most times there will be no hazardous wastes, or 20-50 drums awaiting disposal.
- D. There are bulk tanks on the property. Only one, the 3000 gallon capacity number six tank is to be used for hazardous waste storage; limited to waste flammable solvents and waste halogenated solvents. These wastes have EPA numbers F001, F002, F003, F004, and F005.

CLOSURE PROCEDURE

- A. Those wastes which have predesignated disposal sites will be transported to those sites.
- B. Those wastes which have no predesignated disposal sites will be cleared for acceptance at an appropriate disposal site, and transported to that site.
- C. Soil suspected of being contaminated will be tested if necessary, skimmed and taken to Wayne Disposal, Belleville, MI, for secure landfill.
- D. Tank number six will be cleaned out of all residue in bottom. The residue will be taken to an incineration site or to another site such as Chem-Met Services, as appropriate. Because of the limited types of wastes stored in it (F001, F002, F003, F004 and F005), decontamination will present no problems. After the residues have been thoroughly cleaned out, the tank will be used for waste oil storage.
- E. When closure is completed, the EPA Region V Administrator will be sent a copy of the plan for closure, certified by a professional engineer.

ESTIMATED CLOSURE COSTS

A. DRUMS:

Based on an average of 50 drums on site

Disposal	\$28/drum X 50 drums	\$ 1,400
Transpostation	\$38/hr X 5 hrs	<u>190</u>
		\$ 1,590

B. BULK:

Based on 3000 gallons in tank #6, non-reclaimable

Disposal at General Portland by incineration	
	\$0.30/gal X 3000 gal
Transportation	\$38/hr X 8 hrs
	<u>304</u>
	\$ 1204

Based on 3000 gallons in tank #6, reclaimable

Disposal at U.S. Chemical	
	no charge
Transportation	\$38/hr X 6 hrs
	<u>\$ 00</u>
	228
	\$ 228

C. TANK NO. 6 RESIDUES:

Based on 100 gallons of sludge

Disposal at Chem-Met Services	
	\$0.21/gal X 100 gal
Clean-out and transposition	
	\$38/hr X 6 hrs
	<u>228</u>
	\$ 249

D. CONTAMINATED SOIL:

Based on 500 sq ft 6 in deep

Disposal at Chem-Met Services	
	\$42/cu yd X 10 yd
Skimming and transposition	
	\$39/hr X 4 hrs
	<u>156</u>
	\$ 576

E. ESTIMATE TOTAL COST:

Based on worst-case of each of the above

A.	\$ 1,590
B.	1,204
C.	249
D.	<u>576</u>
	\$ 3,619

SUBPARTS I & J - CONTAINERS AND TANKS

All metal 55 gallon drums which contain hazardous waste products shall be DOT-roadworthy, and the material stored in them shall be compatible with all containers and waste stored in the location.

The waste product drums shall be properly placarded, identified and inspected. They shall be managed to prevent leaks. They are stored at least 50 feet from the property line in an area enclosed by a chain link fence and protected against intrusion by ADT monitoring.

Only one tank, a 3000 gallon horizontal steel above-ground tank is used to store hazardous wastes. Product stored in this tank will not cause corrosion or leakage. This tank is not uncovered and is not connected to pumping or piping systems. This waste may be ignitable. Any waste stored in the tank shall have a complete analysis prepared before storage. Incompatible wastes shall be stored in separate tanks, should the need arise.

TRANSPORT REQUIREMENTS

All waste shall be packaged in accordance with DOT regulations. Containers shall be marked, labeled and placarded as needed.

No international shipments of waste material are made to or from this site.

STATUS REPORT - RCRA COMPLIANCE 7/10/83
Salco, Incorporated
Monroe, Michigan
EPA ID. No. MID000722728
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ADDENDA TO RCRA COMPLIANCE REPORT

The following addenda, as referred to on page 2 of this report, are in this section:

1. Spill Prevention Control and Countermeasure Plan, dated January 30, 1980 and revised on December 8, 1981, and again on August 1, 1982.
2. Driver Manual/Instructions dated 1980 and updated as needed.
3. Precautionary letters to the local Police and Fire Departments, and the local hospital and ambulance service.

"ORIGINAL"

SPILL PREVENTION CONTROL AND COUNTERMEASURE PLAN
AND
POLLUTION INCIDENT PREVENTION PLAN
MICHIGAN DEPARTMENT OF NATURAL RESOURCES

For the Bulk Storage Facility At:

SALCO, INCORPORATED
dba SALCO Industrial Services
704 Conant Avenue
Monroe, Michigan 48161

January 30, 1980

Revised

December 8, 1981

Revised

August 1, 1982

Supplied to conform with
40 CFR, Part 112.
Oil Pollution Prevention
Environmental Protection Agency

Supplied to conform with
Rule 5 Guidelines
Section 162, Act 245
Department of Natural Resources
State of Michigan

Consultant:
Earl R. Williams, B.A., M.S.
Environmental Sciences
800 Meadowbrook Drive
Mt. Pleasant, Michigan
(517) 772-5223

Professional Engineer:
Harry F. Deegan, P.E.

SALCO, INCORPORATED
dba SALCO Industrial Services
704 Conant Avenue
Monroe, Michigan 48161

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POLLUTION INCIDENT PREVENTION PLAN
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THE COMPANY

Salco, Incorporated
dba Salco Industrial Services
704 Conant Avenue
Monroe, Michigan 48161

Company Telephones:

Monroe - 313/243-2820
Toledo - 419/255-6463

Due to major changes in storage capacity, engineering improvements and procedures, this Plan has been prepared to supplant the original Spill Prevention Control and Countermeasure Plan for the facility prepared by Earl R. Williams, Consultant and Harry F. Deegan, P.E., dated January 30, 1980.

An extension of the company telephone number has been installed in the general managers home, providing after hour answering service.

The facility is attended on a regular basis on Monday through Saturday each week. When it is closed, the gates to the chain link fencing which surrounds the entire property are chained and padlocked. The building housing the office and garage is always secured and the equipment in the yard is wired to an ADT system to the Monroe City Police Department. Transports and tankwagons cannot get into the property when it is not attended by key personnel.

24 Hour Telephones in Emergency

Frank Fulner, Vice President and General Manager	
Pager:	419/534-7365
David Shipe	313/397-0905
Tom Salah	419/536-4000

POLLUTION INCIDENT PREVENTION PLAN
Salco Industrial Services 12/08/81
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The plant facility is built on a one (1) acre plot. Besides a large yard area, it contains one single floored concrete building. This structure contains the company offices and a large garage facility. It also has space for laboratories and warehousing. It was designed and built in 1963 as a distributive warehouse.

The property is urban land, built on a landfill. Originally, it was a wetlands area. The urban fill consists mostly of spent foundry sand which was carefully capped with a two foot layer of clay before it was developed into commercial property. This one (1) acre parcel was part of a large landfill which now has been shut down completely. Most of the landfill is undeveloped although tracks of a railroad right-of-way separate the plant from an open bay and creek area which drains to Lake Erie.

The fill has settled for many years and together with the compacted thick clay cap, it makes an excellent location for temporary storage of nonflammable liquid petroleum wastes and certain other hazardous chemicals.

Salco, Incorporated, dba Salco Industrial Services, has been approved and licensed by the State of Michigan to pick up certain analyzed toxic and hazardous liquid wastes from customers in Michigan and Ohio and haul them to certain locations which are also licensed and approved by the State of Michigan. The licensing agency is the Oil & Hazardous Materials Control Section, Water Quality Division of the Michigan Department of Natural Resources. The company license number is 366 and was issued in 1979.

At present, company operation extends to a 200 mile radius of Monroe. The company currently operates up to four (4) tankwagons and three (3) road worthy semi-trailers. The company has a road oiling operation as well as a liquid waste hauling business.

Although the company disposes of most liquid wastes immediately to various facilities licensed by the Michigan Department of Natural Resources, some product will be stored at the Monroe facility as occasion demands, for short periods of time.

Besides waste oils such as lubes, motor oils and industrial emulsions, some hazardous materials such as solvents are stored at the facility.

Primary bulk storage at the facility consists of seventeen (17) horizontal steel tanks. Total capacity is 129,000 gallons. The tanks are enclosed in an undrained, carefully shaped and compacted clay dike. The dike and basin have been relined with a compacted clay seal cap in April, 1982.

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Minimal numbers of metal drums, containing waste or hazardous materials are stored on a temporary basis -- no longer than 30 days -- in the bermed transfer area of the yard. The procedures for storage of these drums meet all regulations of the environmental agencies including the United States Department of Transportation.

It is company policy that anything flammable stored in the drums containing waste materials shall be carefully monitored and drum lids, caps and bungs are carefully inspected for tightness and for leaks.

At the present time, Salco, Incorporated, dba Salco Industrial Services, does not actively engage in the oil spill clean-up business, although it has vacuum trucks and the General Manager has a great deal of experience and expertise in working on oil spill problems.

The company, at this time, does not store or transport PCB's - Polychlorinated Biphenyls. It does not store or transport transformers or capacitors that use coolants that contain PCB's.

The company facility, including the building, yards, drives and easements, are being upgraded and improved, not only to be environmentally sound but attractive in appearance as well. This one (1) acre facility is a working facility in a working neighborhood, and its appearance blends with the entire surroundings.

The area is low, level and often wet, as ponding tends to occur on top of the two foot clay cap. The drives and yard are surfaced with gravel.

A serious environmental hazard was removed from the area of the facility in the summer of 1979 when an open drain, located on the south easement of Wood Street which borders the north side of the plant, was enclosed in a storm sewer and covered over and graded. Wood Street was then paved and curbed with concrete. Although storm sewer catchbasins are placed at intervals along the south curb of the street, the danger of a spill reaching them is much less than when an open flowing ditch was beside the plant.

The storm sewer drain outfalls into Plum Creek at a point within one (1) mile of the facility. The storm sewer catchbasins represent the closest access point from the plant to the waters of the United States.

The facility has been in operation since 1977.

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Salco Industrial Services 12/08/81
Conant Avenue Facility
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Owners and Operators:

Tom Salah, President
2252 Applewood
Toledo, Ohio 43601

419/536-4000

Frank Fulner, Vice President and General Manager
739 Washington Street, Apt 112
Monroe, Michigan 48161

313/243-2826

SPILL CONTROL RESPONSIBILITY

Mr. Frank Fulner, Vice President and General Manager has the prime responsibility for implementing and complying with the requirements of this Pollution Incident Prevention Plan. He has thoroughly discussed the problems and related causes of oil spills with Earl R. Williams, Consultant and with investigators of the United States Environmental Protection Agency and the Oil and Hazardous Materials Control Section of the Michigan Department of Natural Resources.

Mr. Fulner has had a great deal of experience in oil spill prevention control and specialized knowledge of oil spill clean-up methods and is especially qualified for this responsibility. He has carefully noted and specifically identified those areas at the plant where a spill may occur. The company is preparing facilities and methods to contain any spill that may occur before it can reach the waters of the United States or the ground waters of the State of Michigan. All personnel of the company fully understand their responsibility to the environment and the federal and state requirements for the cleaning up of all petroleum and hazardous material spills and reducing the probability of their occurrence.

All tankwagons and transports which use this facility shall be in roadworthy condition.

The emergency telephone numbers of all government authorities who must be contacted in event of a spill shall be readily available at the office of the plant. A designated person at the facility shall be responsible for contacting the proper authorities in event of an emergency spill.

FACILITY DESCRIPTION

The Salco, Incorporated, dba Salco Industrial Services, site is on filled urban land on the Lake Erie Flood Plain located between the River Raisin on the north, and Plum Creek on the south, in the City of Monroe, Michigan.

This area was once swampy wetlands on the shores of western Lake Erie and the process of filling it in has taken many years and continues to the present time. This landfill, actually occupying both sides of Plum Creek Bay, has enabled the large deep water port of Monroe to be created plus giving solid terrain for important installations of the Ford Motor Company, Detroit Edison Company and other industries.

The fill land extends eastward from the embankment of the Detroit and Toledo Shore Railroad for almost three (3) miles. Its width varies from a few hundred feet to up to four (4) miles.

Various materials have been used for fill in this on-going project. The site of Salco, Incorporated, dba Salco Industrial Services, is near the western edge of the fill and was one of the first areas to be built upon. The soil here consists mostly of spent foundry sand which is capped by a two foot thick layer of compacted clay.

The filled land is crossed by the bridges and embankment of Interstate I-75, located about one-half mile east of the Salco Industrial Services site. It is also crossed by a two-track rail spur operated by the Detroit and Toledo Shoreline Railroad. This busy siding is located about 200 feet south of the Salco Industrial Services facility and serves the Port of Monroe and the utility and large industrial locations near the Lake Erie shoreline. The railroad separates Salco Industrial Services from Plum Creek, which is located about one-half mile southwest of the facility.

In recent years, the filling in of wetlands along the shores of Lake Erie and other bodies of water has become a controversial issue that is politically explosive. This area, though filled in long ago, and the industries that use it, is closely monitored by not only federal and state environmental agencies, but several citizen groups as well. The entire Lake Erie Basin, including its tributary streams is monitored by satellite by the Environmental Protection Agency. Any spill of petroleum or other hazardous liquid wastes into the waters of the area will almost certainly bring prompt and adverse response from environmental agencies and citizen groups.

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The facility of Salco Industrial Services is located on the eastern edge of the occupied or inhabited part of Monroe. The property is in T.7S - R.9E of Monroe Township in Monroe County, Michigan. The county is the easternmost county of Michigan's southern tier of counties and borders the western shore of Lake Erie. It borders the State of Ohio on the south.

Monroe is an old city and port. Its geographical position is approximately 41.56 N. Lat. - 83.24 W. Long. It was first settled in 1788 and the county was organized in 1822. Today, the city is growing as an important transportation, commercial and industrial center and has a population of approximately 25,000 persons. It lies astride the transportation corridor between Detroit, 35 miles to the north, and Toledo, about 20 miles to the south. It is served by five (5) railroads and several Interstate, U.S., Michigan State and Monroe County highways.

While the city is rapidly being assimilated into the metropolitan region, the western part of the county remains essentially rural in nature and supports a prosperous agricultural industry. The soils in the county are fertile and the terrain is nearly level. The continental climate of the area is mitigated by the nearness of Lake Erie. Snow cover in the area of the Salco Industrial Services plant is generally limited in nature.

The company property contains a bulk storage facility for waste oils and liquid hazardous materials. Besides the storage area, this one (1) acre site contains truck parking areas, drives and a single floored block building built on a concrete pad. This building is now used only for offices and a garage, but it has space for a proposed laboratory and warehouse for storage of non-combustible goods.

The 40,000 sq. ft. property is located at the southwest corner of Conant Avenue and Wood Street. These city streets are curbed and paved. An extension of Conant Avenue continues southward across the fill land but is not open to the public and is not paved. The plant is five (5) blocks south of First Street, a main east-west city street. It lies seven (7) blocks south of the River Raisin and the Front Street Interchange with I-75.

Lateral ditches no longer serve the area and runoff from the plant property is slow. A storm sewer catchbasin on the south curb of Wood Street, about 150 feet west of the plants main entrance-way, is the closest access point from the plant to the waters of the United States. Plum Creek lies about one-half mile away.

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The facility is bordered on the west by the property of abandoned industrial plant. The railroad embankment is about 500 feet to the west. The storm sewer enters a railroad ditch at this point, which in turn, drains southward to the creek.

A large salvage yard is located across the Detroit and Toledo Shore Railroad tracks. It extends southward all the way to the creek and drains to the railroad ditch as well. It is important that any spill from this facility does not get blamed on the Salco Industrial Services plant. Salco Industrial Services would put a containment barrier in the ditch to prevent any possible spill from entering the creek, should a spill occur.

The Salco Industrial Services plant is a working facility. Unfortunately, its unpainted waste oil tanks, together with the abandoned nearby factory and the cluttered salvage yard, contribute to the appearance of urban blight in the neighborhood. The appearance of the residential property north of the plant blends into the general appearance.

Except for the railroad right-of-way, the fill land to the east and south of the Salco Industrial Services facility is open and unused.

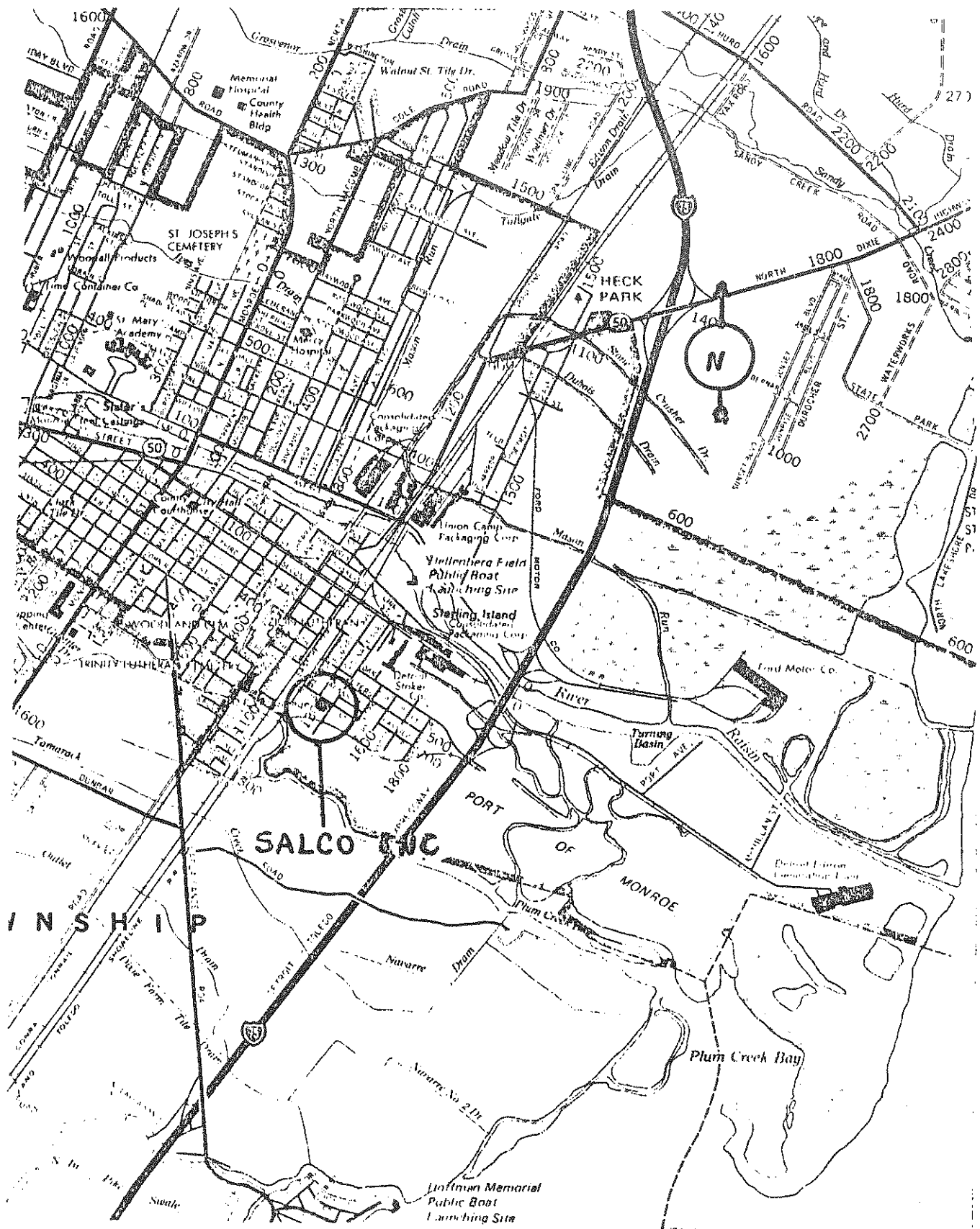
- See Map, Page 8.

Since Conant Avenue is unpaved and closed to through traffic south of the Wood Street intersection, the company gate facing that street is usually chained and padlocked, even though the company address is on Conant Avenue. Entrance to the drives, yard and building of the plant is through the gate from Wood Street on the north.

The portion of the company that is fenced is a square area that is 200 feet long on each side. The building is not part of the property line and the six (6) foot high chain link fence, while maintained in excellent condition, is not barbed. It is noted that the company was specifically asked by the Monroe City Police not to put barbed wire at the top of the fence.

The entrances to the office and garage are on the west side of the masonry and steel building and face the west driveway. The building has dimensions of 50' x 100'. It is served by a shipping and receiving truck well on its south side. This ramp is undrained. The building is maintained in adequate condition. There is no drum storage inside the building and the company plans to extensively remodel it to include a laboratory and equipment warehouse.

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The drives and yard areas are stabilized with gravel and crushed stone over the compacted two foot deep clay cap. The drives, storage yards, and parking areas are free of vegetation.

Small sections of lawn are located between the building and the north and east fence line, around the unused shipping well and on the easements bordering the streets. These lawns are mowed and groomed. They, the fence and the well-painted building add greatly to the appearance of the facility.

Parking for automobiles, tankwagons and small trucks is provided for on the yards west of the building. The south end of the plant is used for the storage and transfer area.

A clay dike that is roughly rectangular in shape, encompasses the bulk storage tanks. It is five (5) feet wide at its base and $2\frac{1}{2}$ feet high. It is carefully shaped so that a path, one (1) foot wide is at its apex. It has been heavily compacted so that its sides are consistent with the angle of repose of the clay. Its enclosed basin consists of a two (2) foot thick clay cap and is undrained. The dikes and basin are not sodded over.

The inner dimensions of the diked containment area are approximately 85' x 60' and its containment capacity exceeds 65,000 gallons. Primary storage consists of seventeen (17) horizontal steel tanks with a total capacity of 129,000 gallons. The largest tank has a capacity of 30,000 gallons and the dike capacity exceeds minimum environmental requirements of 55,000 gallons needed for compliance at this facility.

Many of the asphalt coated but unpainted tanks are placed next to each other, with little or no room between them. They are supported in place by compacted clay fill. This method of supporting primary storage tanks that contain waste oils has been specifically approved at this site by agents of the DNR and EPA although not in writing.

It should be noted that this Pollution Incident Prevention Plan is concerned only with compliance with regulations of the Michigan Department of Natural Resources and the United States Environmental Protection Agency. The officers; of Salco Industrial Services should, however, be completely familiar with the 1973 edition of the Michigan Flammable Liquids Regulations.

There is no piping or valving connected to the seventeen (17) storage tanks. Each has an intake pipe and access cover at the top of the tank. Each tank is properly vented.

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Waste products are pumped to or vacuumed from the tanks by the tankwagons or transports own pumping units. Flexible hose is used in this operation. The tanks are not gauged.

The company has enclosed the remainder of the southwest section of the property with a new clay berm, which encompasses vehicle unloading location. The berm is built along part of the fence line and should provide excellent protection against the possibility of any spilled product leaving company property.

The clay berm is about two (2) feet wide at its base and one (1) foot in height. It has been compacted but not seeded over. It is free of vegetation.

The berm extends southward from the south east corner of the dike for 20 feet to the south fence line. From here it extends westward about 110 feet to the corner of the property, thence northward about 110 feet along the west fence line. From this point, a ramped clay curbing extends southeastward across the drives to an anchor point at the northwest corner of the dike.

This ramped clay berm is about five (5) feet wide at its base. It is one (1) foot in height and has been covered with a thick layer of crushed stone. It has been carefully compacted but must still be closely monitored for damage caused when vehicles cross it. Any damage must be immediately repaired.

An Oil/Water separator site and an impervious retention basin for barrel dumping of waste oils is being constructed inside the transfer area of the facility.

This site shall contain the present 6,000 gallon underground tank now used for that purpose. A circular dump site, with a diameter of 12 feet shall be built above the tank. The sides of the dump area shall slope to the center to a depth of approximately three feet. The soil shall be properly prepared here with a visqueen layer, a clay seal blanket and a sand blanket used for a base for a concrete seal liner at the surface. The circumference of the dump area shall be enclosed with a concrete berm approximately four (4) inches in height and four (4) inches in width. The entire area will be covered by a properly footed steel grate.

A steel fill pipe shall extend from the tank to within six (6) inches of the surface of the retention basin. This is designed so only oil on the surface of the basin can skim to the tank.

Field engineering shall apply in the construction of this retention area. The design shall be submitted to the Michigan State Department of Natural Resources.

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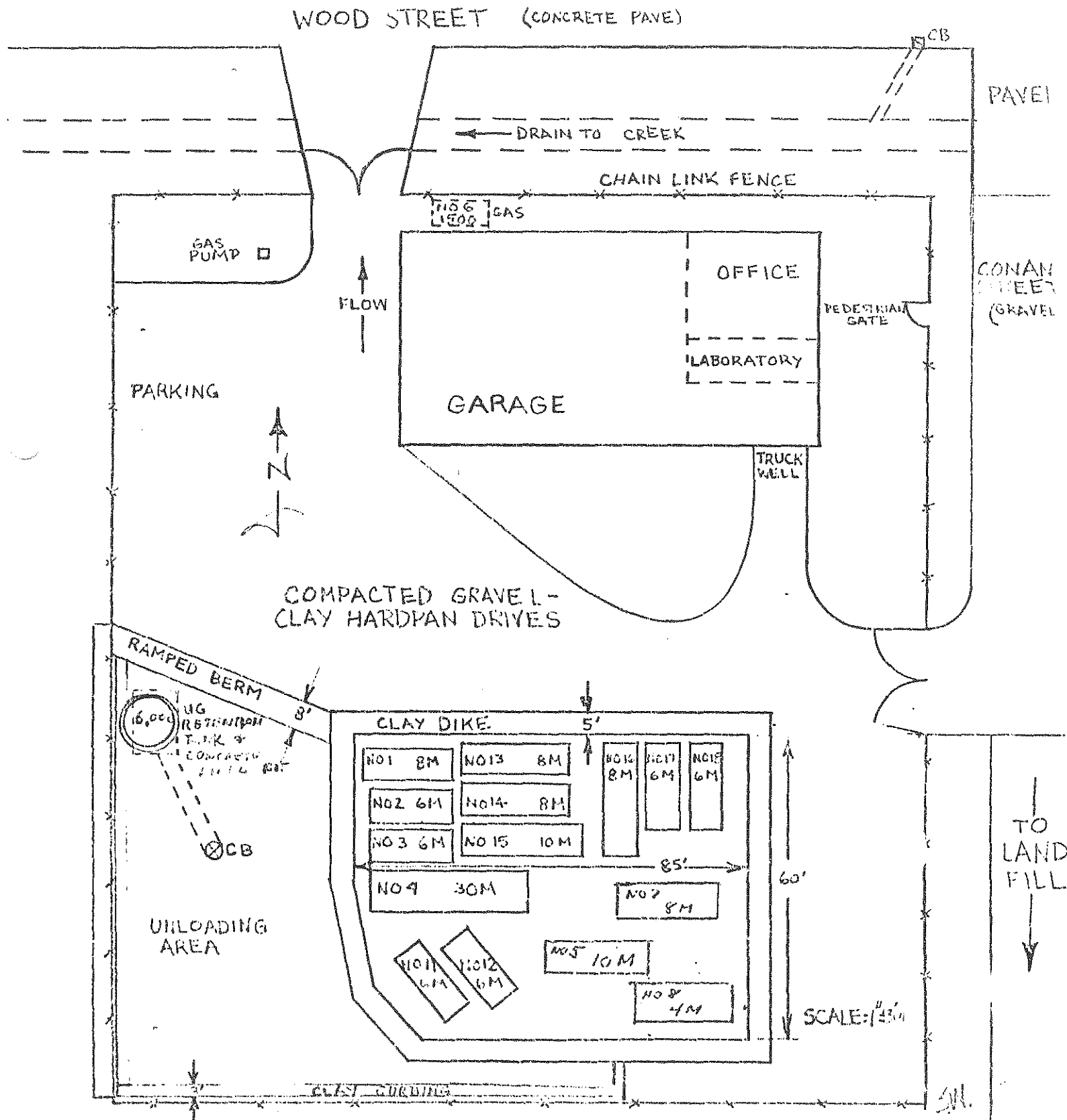
Water shall be removed from the retention basin only under controlled conditions by portable pump and hose. The system shall be carefully monitored.

The retention tank was installed in 1981 and 1982 in the yard at the request of the Oil and Hazardous Materials Control Section of the DNR.

Bulk storage of flammable liquid per se at the facility is in a 1,500 gallon underground steel tank located between the building and the north fence line. This tank contains gasoline for company use only. It is located about 10 feet east of the drive and filled by gravity tight fill from tankwagons which stand on the drive. It has a locking cap and is properly vented. It is connected to a service station pump placed on a concrete pad in the yard across the entrance drive to the west. This pump is about 40 feet from the building. Its nozzle is padlocked and the electrical disconnect is inside the building.

The facility is well lighted. Many precautions have been taken to assure that no oils will get into the waters of the United States, ground waters of the State of Michigan or otherwise harm the environment.

See Site Plan, Page 12



STORAGE

The permanent primary aboveground storage facilities at the plant consist of fifteen (15) coated horizontal steel tanks. Waste oils, lubes, solvents and other petroleum emulsions containing bio-degradable oils are stored on a temporary basis only.

All tanks are properly vented and have access covers. They are properly capped. They are not gauged nor are they connected to piping and pumping facilities.

Tankage is as follows:

	<u>TYPE</u>	<u>DIMENSIONS</u>	<u>CAPACITY</u>	<u>PRODUCT</u>
# 1	Horizontal Steel	10'6" x 36'	30,000	Waste Oil
# 2	Horizontal Steel	8' x 21'4"	8,000	Waste Oil
# 3	Horizontal Steel	8' x 16'	6,000	Waste Oil
# 4	Horizontal Steel	8' x 16'	6,000	Waste Oil
# 5	Horizontal Steel	8' x 21'4"	8,000	Waste Oil
#	Horizontal Steel	5'4" x 18'	3,000	Waste Oil
#	Horizontal Steel	5'4" x 24'	4,000	Waste Oil
#	Horizontal Steel	8' x 16'	6,000	Waste Oil
#	Horizontal Steel	8' x 16'	6,000	Waste Oil
#	Horizontal Steel	8' x 21'4"	8,000	Waste Oil
#	Horizontal Steel	8' x 21'4"	8,000	Waste Oil
#	Horizontal Steel	8' x 26'8"	10,000	Waste Oil
#	Horizontal Steel	8' x 21'4"	8,000	Waste Oil
#	Horizontal Steel	8' x 16'	6,000	Waste Oil
#	Horizontal Steel	8' x 16'	6,000	Waste Oil

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Total Above Ground Storage. 129,000 Gallons
Dike Containment Capacity 64,000 Gallons
Required Dike Containment Capacity. 55,000 Gallons

	<u>TYPE</u>	<u>DIMENSIONS</u>	<u>CAPACITY</u>	<u>PRODUCT</u>
# 6	Steel Underground	5'4" x 9'	1,500	Gasoline

The facility also contains a 5,000 gallon underground steel holding tank used for the retention of all drainage from the bermed yard area.

PRODUCT TRANSFER PROCEDURES

All waste oil, emulsions, chemicals and other hazardous materials are brought to the facility in company vehicles driven by company personnel or waste haulers who are duly licensed by the DNR. Due to the nature of their work, all drivers and brokers are carefully trained in spill prevention and containment techniques. Of course, there will be immediate response to any spillage which occurs on the property or involving company waste hauling vehicles.

Waste products are pumped from the transports and tankwagons to the bulk waste storage tanks by their own pumps or by portable pumps and hose. Before they discharge their product, the drivers must check tank capacity, pumping equipment, and hose before making a delivery.

Product is not metered in and the pumping capacity depends on the equipment which is being used. Great care must be taken to ensure that the vehicles are inside the bermed area before product is transferred. Waste oils must not be allowed to overflow the tanks and flexible hose must not be allowed to drain onto the ground.

Product is removed from the tanks by pumping or vacuuming equipment and transported to licensed disposal sites. The amount of product brought to the plant and removed from it is accounted for in the bills of lading.

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SPILL CLEAN-UP CONTROL

There is no oil spill cooperative in the Monroe, Michigan area. However, the General Manager of the company has worked closely in the past with personnel of the U.S. Coast Guard, EPA and the Michigan DNR in oil spill clean-up and control work. Since the company has trained personnel for this type of work, it is seriously considering the possibility of actively pursuing this type of business and will soon have complete oil response capabilities and equipment.

Sorbent pads and a spade shall be carried on each company transport and tank-wagon. All company personnel who use this facility or the equipment operating from it shall understand exactly what their own duties shall be if there is a spill at the facility or involving the company vehicles. They have been instructed in oil spill prevention methods and shall be familiar with this plan. All new employees shall be provided with proper oil spill prevention and control instructions.

All company personnel shall understand the importance of being courteous and accommodating to all inspectors and agents of all government agencies. Failure on the part of any employee to respond positively to an oil or hazardous material event shall be cause for immediate dismissal.

This plan shall be reviewed periodically by one of the officers of the company.

Investigators from various environmental agencies are familiar with the facility. A copy of this plan shall be on file with the Michigan DNR and it shall be reviewed in detail by personnel of the Oil and Hazardous Materials Control Section.

Investigators from the United States EPA shall inspect a "certified" copy of this report, which must be kept in the plant office for easy access at all times. Further, inspectors from the EPA or United States Coast Guard have the right to inspect the facility to see if it is in compliance as outlined in this plan.

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SPILL PREVENTION PROTECTION

The maintenance of the yard, drives, building and equipment of the Salco Industrial Services facility at Monroe, Michigan is adequate. It has adequate cosmetics and blends with the appearance of the neighborhood. The facility is duly licensed as a waste hauler by the DNR.

Many environmental improvements have recently been installed at the facility. It appears that it is highly unlikely that any spill occurring at the plant will drain to the waters of the United States or the ground waters of the State of Michigan.

However, the nature of the business is conducive to the probability of spillage and improved inventory control and product transfer procedures should be instituted at the plant.

Further, because of the location of the facility on former wetlands and the political environment of present day society, extra effort should be made to improve the appearance of the site and work within the industry itself to educate concerned citizens regarding the business.

SURVEILLANCE

The facility is attended on a regular work schedule six (6) days each week. Key personnel are almost always in attendance when the plant is open. The entire plant is securely enclosed with chain link fencing which is maintained in excellent condition. When closed, the gates are chained and padlocked. The office and warehouse building is also locked and the gasoline nozzle is padlocked. In addition, the yard is trip-wired with ADT controls to the Monroe City Police.

The facility is located in an urban area and is well lighted. It is surveyed periodically by Monroe City Police. It is not considered to be a likely target for sabotage, but the entire area may be conducive to acts of vandalism.

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LICENSED OIL SPILL CONTRACTORS

Although Salco Industrial Services may be licensed and qualified to respond to oil spill events in Michigan, it is a requirement of the Rule 5 Guidelines of Section 162 of Act 245, State of Michigan, that this PIPP Plan list two (2) additional oil spill response companies to be called immediately should a spill event get away from the control of the company. This could happen should spillage reach Plum Creek Bay.

The companies listed below can handle such a spill on open water.

Marine Pollution Control	313/849-2333
8631 W. Jefferson Avenue	
Detroit, Michigan 48209	
DNR License # 116	

M. Petty & Sons	419/693-5879
134 Midvale	
Toledo, Ohio 43605	
DNR License # 242	

SPILL CONTROL EQUIPMENT ON SITE

Sorbent pads and miscellaneous tools shall be available at the warehouse for immediate deployment to the drives, should a spill occur. Sorbent pads and a shovel shall be carried on all transports and tankwagons.

Consideration is being given to the purchase of additional oil spill response material to be used on a commercial basis. Present supplies are adequate for the needs of the facility.

POLLUTION INCIDENT PREVENTION PLAN
Salco Industrial Services 12/08/81
Conant Avenue Facility
Monroe, Michigan
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INVENTORY CONTROL RESPONSIBILITY

Frank Fulner, Vice President and General Manager
739 Washington Street, Apt 112
Monroe, Michigan 48161

313/243-2826

All waste oils and other hazardous materials are brought to the plant in the company's own vehicles or by licensed brokers. All pickups should be manifested and logged into the storage facilities. A log of shipments should be kept also, and all shipments should go with bill of lading.

A carefully kept log should show all materials and quantity brought into the yard and removed from it. It should also indicate the source of the waste material and disposition as shipped. Vehicle numbers and drivers should also be recorded.

The underground tank used for gasoline storage shall be gauged at each delivery. Readings shall be taken and recorded at least once a month. Comparison of receiving tickets and metered outages shall be made regularly to determine shortages or losses.

SPILL NOTIFICATION LIST

- (a) MICHIGAN DEPARTMENT OF NATURAL RESOURCES
Oil and Hazardous Material Control Section
Pollution Emergency Alert System (PEAS)
24- Hour Telephone (Toll Free) 1-800/292-4706

NOTE: The PEAS number must be called immediately to report a spill or leak which may involve surface or ground water.

- (b) ENVIRONMENTAL PROTECTION AGENCY and
U.S. COAST GUARD OIL SPILL CONTROL
Washington, D.C. (Toll Free) 1-800/424-8802

NOTE: The above national response facility must be called immediately in the event there is a spill that puts harmful amounts of oil into the waters of the United States.

POLLUTION INCIDENT PREVENTION PLAN
Salco Industrial Services 12/08/81
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Monroe, Michigan
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(c) DEPARTMENT OF NATURAL RESOURCES
Water Quality Control Division
Stephen T. Mason Building
Lansing, Michigan 517/373-1794

(d) ENVIRONMENTAL PROTECTION AGENCY
Emergency Response Team
9311 Groh Road
Grosse Isle, Michigan 48138 313/676-6500

(e) UNITED STATES COAST GUARD
Captain of the Port
Detroit, Michigan 313/226-6860

(f) DEPARTMENT OF NATURAL RESOURCES
District # 1, Basin Engineers
Point Mouille, Rockford, Michigan 313/379-9692

NOTE: As a licensed waste hauler and as a possible future oil spill response company, it is imperative that excellent communications be maintained with representatives of the various federal and state agencies responsible for the control of water pollution. These agencies have licensing and regulatory powers.

(g) Emergency Telephone Service 911
(h) Monroe City Police 313/241-3300
(i) Monroe City Fire Department 313/243-6850
(j) Michigan State Police
Temperance, Michigan 313/847-3838
(k) Monroe County Sheriff 313/241-2727
(l) Monroe County Civil Preparedness 313/241-6400
(m) Monroe County Drain Commissioner 313/243-6900
(n) Monroe County Health Department 313/241-9434
(o) Monroe City Offices 313/243-0700

POLLUTION INCIDENT PREVENTION PLAN
Salco Industrial Services 12/08/81
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SPILL CONTINGENCY PLAN

The liquid waste storage and transfer facility of Salco Industrial Services is located at 704 Conant Avenue on the east side of the City of Monroe, Michigan. Due to its location on wetlands near Lake Erie, a strong Spill Contingency Plan shall be in effect for this plant. It is imperative that all parts of this plan be strictly adhered to. The following plan is required under 40 CFR, Part 112.7 (d)(1) of the Federal Register.

1. All tanks shall be carefully measured for available capacity before any product is pumped to them.
2. Drivers shall not leave the transfer area while product is being loaded or unloaded.
3. The facility, including yards, drives, tankage and retention pit and barrel storage area shall be carefully inspected each working day.
4. Good housekeeping must be constantly enforced at this facility. All drives shall be kept free of impediments.
5. There shall be no drainage or spillage from flexible hose or tank-wagons and transports onto the drives or yard areas.
6. Proper sorbent materials and equipment shall be available for prompt deployment to a spill of hazardous material both at the facility or involving company vehicles on the road.
7. Procedures for spill notification shall be maintained for easy access at the office.
8. This plan shall be on file with Earl R. Williams, B.A., M.S., Consultant, who shall be immediately notified, should a spill occur that is reportable.
9. This plan must be reviewed at least once per year by an officer of the company.

POLLUTION INCIDENT PREVENTION PLAN
Salco Industrial Services 12/08/81
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STATEMENT

The officer of Salco, Incorporated, dba Salco Industrial Services, whose signature appears below states that he has carefully read this report and intends to implement the facility located at 704 Conant Avenue, Monroe, Michigan 48161, with sound engineering practices and procedures in accordance with 40 CFR, Part 112 and Part 5, Section 162 of Act 245, State of Michigan.

Signed

EVALUATION PROCEDURES

This plan must be reviewed and re-evaluated by the officers of the company on or before December 8, 1984, and a statement attesting to this must be attached to the certified copies of this plan. If major changes to the facility have occurred in the interim, and those changes were not part of this plan, it must be corrected and re-certified by a Professional Engineer.

POLLUTION INCIDENT PREVENTION PLAN
Salco Industrial Services 12/08/81
Conant Avenue Facility
Monroe, Michigan
-Page 22

ADDENDUM

This Addendum is prepared to meet proposed new requirements for conformance with CFR Title 40, et al, Section 112.3 as enforced by the United States Environmental Protection Agency.

- I. This SPCC Plan is properly certified, sealed and dated by a Registered Professional Engineer. This Certification is found on the page immediately after the Title Page of the Certified Copies of the SPCC Plan.
- II. This SPCC Plan has the approval of company management and is signed by a company representative. See page 21, of this SPCC Plan.

- | | |
|-----------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------|
| Section 112.7(a) | There has been a spill of petroleum products at this facility in the past 12 months. |
| Section 112.7(b) | This facility is environmentally well designed and engineered. There is <u>not</u> a reasonable potential for equipment failure at the site. |
| Section 112.7(c) | The containment basin is enclosed by an earthen dike. |
| Section 112.7(d) | This Pollution Incident Prevention Plan provides for a strong Spill Contingency Plan. |
| Section 112.7(e)(a)(i) | There are no drains from the diked storage areas. |
| Section 112.7(e)(1)(ii)
thru
Section 112.7(e)(1)(v) | are not applicable to this facility as there is no drainage of effluents or contaminated liquids from this facility. |
| Section 112.7(e)(2)(i)
thru
Section 112.7(e)(2)(ix) | deals with bulk storage tanks. |

The bulk storage tanks are of steel construction. Secondary containment is constructed of compacted clay and has a containment capacity that equals the largest tanks content plus sufficient free-board for precipitation. There are no drains from the diked storage basin.

There are no buried or partially buried tanks that are used for containment at this facility.

All tanks are subject to a visual inspection on a daily basis. Inspections shall include footings and foundations. There are no internal heating coils in these tanks.

No effluents of any kind shall be discharged from this bulk storage facility for waste oils to the waters of the United States.

The bulk storage facility is visually inspected each day for leaks from gaskets, seals, rivets and bolts. Any equipment which leaks shall be promptly repaired.

Mobile or portable storage at the facility is limited to one (1) 3,000 gallon capacity semi-tank unit which shall be stored on a temporary basis inside the bermed transfer area.

Section 112.7(e)(3)(i)
thru

Section 112.7(e)(3)(iv)

deals with facility transfer operations.

There is no piping at this facility.

Section 112.7(e)(4)(i)
thru

Section 112.7(e)(4)(iv)

regards loading and unloading procedures.

Transfer procedures appear to meet minimum requirements of the Department of Transportation.

A bermed retention area containing a 6,000 gallon drain tank provides superior retention facilities for this transfer area. The largest compartment of any transport loading or unloading at this facility is easily contained.

Warning signs shall be posted in the transfer area to prevent vehicle departure before complete flexible hose disconnection.

All unloading hose and couplers shall be inspected on a daily basis.

Section 112.7(e)(5)
thru
Section 112.7(e)(7)

are omitted from inspection requirements by the EPA.

Section 112.7(e)(8)

The entire bulk storage and transfer facility is inspected each working day.

Section 112.7(e)(9)(i)
thru
Section 112.7(e)(9)(v)

deals with Security.

The entire facility is enclosed by a 6' high chain link fence. Gates are padlocked, as needed but are generally unchained per request of Monroe City Police. The entire facility is well lighted and ADT trip alarms are used at the plant.

The electrical disconnect for the gasoline pump is located inside the locked building. The gasoline storage tank is provided with a locking fill cap.

Section 112.7(e)(10)(i)
thru

Section 112.7(e)(10)(iii) deals with personnel training and spill prevention.

All personnel have been trained in oil spill prevention, the use of sorbent materials, and the operation and maintenance of equipment to prevent spills. Designated key personnel are accountable for oil spill prevention at the plant. A yearly schedule is maintained by the company to assure that personnel are adequately informed in regard to the SPCC Plan.

DRIVER INSTRUCTIONS

This driver instruction booklet is to be studied and learned by the below assigned driver.

Become thoroughly familiar with the material in these pages. You may at anytime be checked out on your knowledge of these instructions.

Knowing this material is an extremely important part of your job, now that the EPA regulations are in strict enforcement for hazardous waste transportation.

New material will be added to these regulations from time to time, as the need arises.

It is your responsibility to always have this assigned booklet with you when you are on a driving run.

• THIS DRIVER INSTRUCTION BOOKLET HAS BEEN ASSIGNED TO:

* I have read, studied, and understand the material in this booklet;

.....
signature

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.....
date

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o I have read, studied, and understand the new material added to this instruction booklet

DATE ADDED

DRIVER SIGNATURE

DATE _____

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A decorative horizontal bar consisting of 26 small, identical circular icons arranged in a single row. Each icon contains a capital letter of the alphabet, starting with 'A' on the left and ending with 'Z' on the right. The letters are in a bold, sans-serif font.

● ● ● ● ● ● ● ● ● ●

● ● ● ● ● ● ● ● ● ●

1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25 26 27 28 29 30 31 32 33 34 35 36 37 38 39 40 41 42 43 44 45 46 47 48 49 50 51 52 53 54 55 56 57 58 59 60 61 62 63 64 65 66 67 68 69 70 71 72 73 74 75 76 77 78 79 80 81 82 83 84 85 86 87 88 89 90 91 92 93 94 95 96 97 98 99 100 101 102 103 104 105 106 107 108 109 110 111 112 113 114 115 116 117 118 119 120 121 122 123 124 125 126 127 128 129 130 131 132 133 134 135 136 137 138 139 140 141 142 143 144 145 146 147 148 149 150 151 152 153 154 155 156 157 158 159 160 161 162 163 164 165 166 167 168 169 170 171 172 173 174 175 176 177 178 179 180 181 182 183 184 185 186 187 188 189 190 191 192 193 194 195 196 197 198 199 200 201 202 203 204 205 206 207 208 209 210 211 212 213 214 215 216 217 218 219 220 221 222 223 224 225 226 227 228 229 230 231 232 233 234 235 236 237 238 239 240 241 242 243 244 245 246 247 248 249 250 251 252 253 254 255 256 257 258 259 260 261 262 263 264 265 266 267 268 269 270 271 272 273 274 275 276 277 278 279 280 281 282 283 284 285 286 287 288 289 290 291 292 293 294 295 296 297 298 299 300 301 302 303 304 305 306 307 308 309 310 311 312 313 314 315 316 317 318 319 320 321 322 323 324 325 326 327 328 329 330 331 332 333 334 335 336 337 338 339 340 341 342 343 344 345 346 347 348 349 350 351 352 353 354 355 356 357 358 359 360 361 362 363 364 365 366 367 368 369 370 371 372 373 374 375 376 377 378 379 380 381 382 383 384 385 386 387 388 389 390 391 392 393 394 395 396 397 398 399 400 401 402 403 404 405 406 407 408 409 410 411 412 413 414 415 416 417 418 419 420 421 422 423 424 425 426 427 428 429 430 431 432 433 434 435 436 437 438 439 440 441 442 443 444 445 446 447 448 449 450 451 452 453 454 455 456 457 458 459 460 461 462 463 464 465 466 467 468 469 470 471 472 473 474 475 476 477 478 479 480 481 482 483 484 485 486 487 488 489 490 491 492 493 494 495 496 497 498 499 500 501 502 503 504 505 506 507 508 509 510 511 512 513 514 515 516 517 518 519 520 521 522 523 524 525 526 527 528 529 530 531 532 533 534 535 536 537 538 539 540 541 542 543 544 545 546 547 548 549 550 551 552 553 554 555 556 557 558 559 560 561 562 563 564 565 566 567 568 569 570 571 572 573 574 575 576 577 578 579 580 581 582 583 584 585 586 587 588 589 590 591 592 593 594 595 596 597 598 599 600 601 602 603 604 605 606 607 608 609 610 611 612 613 614 615 616 617 618 619 620 621 622 623 624 625 626 627 628 629 630 631 632 633 634 635 636 637 638 639 640 641 642 643 644 645 646 647 648 649 650 651 652 653 654 655 656 657 658 659 660 661 662 663 664 665 666 667 668 669 670 671 672 673 674 675 676 677 678 679 680 681 682 683 684 685 686 687 688 689 690 691 692 693 694 695 696 697 698 699 700 701 702 703 704 705 706 707 708 709 710 711 712 713 714 715 716 717 718 719 720 721 722 723 724 725 726 727 728 729 730 731 732 733 734 735 736 737 738 739 740 741 742 743 744 745 746 747 748 749 750 751 752 753 754 755 756 757 758 759 760 761 762 763 764 765 766 767 768 769 770 771 772 773 774 775 776 777 778 779 780 781 782 783 784 785 786 787 788 789 790 791 792 793 794 795 796 797 798 799 800 801 802 803 804 805 806 807 808 809 810 811 812 813 814 815 816 817 818 819 820 821 822 823 824 825 826 827 828 829 830 831 832 833 834 835 836 837 838 839 840 841 842 843 844 845 846 847 848 849 850 851 852 853 854 855 856 857 858 859 860 861 862 863 864 865 866 867 868 869 870 871 872 873 874 875 876 877 878 879 880 881 882 883 884 885 886 887 888 889 890 891 892 893 894 895 896 897 898 899 900 901 902 903 904 905 906 907 908 909 910 911 912 913 914 915 916 917 918 919 920 921 922 923 924 925 926 927 928 929 930 931 932 933 934 935 936 937 938 939 940 941 942 943 944 945 946 947 948 949 950 951 952 953 954 955 956 957 958 959 960 961 962 963 964 965 966 967 968 969 970 971 972 973 974 975 976 977 978 979 980 981 982 983 984 985 986 987 988 989 990 991 992 993 994 995 996 997 998 999 1000 1001 1002 1003 1004 1005 1006 1007 1008 1009 1010 1011 1012 1013 1014 1015 1016 1017 1018 1019 1020 1021 1022 1023 1024 1025 1026 1027 1028 1029 1030 1031 1032 1033 1034 1035 1036 1037 1038 1039 104

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DRIVER INSTRUCTIONS

ACCIDENTAL SPILLS: NOTIFICATION

<u>LOCATION</u>	<u>NOTIFY</u>
● Customer's Plant Site	1. Plant office, or your plant contact. 2. Call S-I-S Monroe (313) 243-2820 Toledo (419) 255-6463 extension
● Within a Town or City	1. Local Police by phone 2. Call S-I-S Monroe (313) 243-2820 Toledo (419) 255-6463 extension If no answer at S-I-S (after hours) call two Hot Lines National 1-800-424-8802 If in Michigan 1-800-292-4706 Or if in Ohio 1-800-282-9378
● On the Highway	1. Michigan State Police Monroe (Erie Post) (313) 848-2015 Temperance (313) 847-3838 Ohio Highway Patrol Toledo (419) 865-5544 (419) 666-1323 The above State Police and Highway Patrol numbers are for those areas listed. If you are in another area (Ann Arbor, Pontiac, Lima, Findlay, etc.) call INFORMATION 555-1212 and request the number for your area. 2. Call S-I-S Monroe (313) 243-2820 Toledo (419) 255-6463 extension If no answer at S-I-S (after hours) call two Hot Lines National 1-800-424-8802 If in Michigan 1-800-292-4706 Or if in Ohio 1-800-282-9378

NOTE: Use the Toledo Extension number (419) 255-6463 only if you are calling from Toledo and the following;

Holland	Sylvania
Perrysburg	Waterville
Maumee	Whitehouse
Swanton	Moline
Curtice-Oregon	Elmore
Genoa	Stoney Ridge

Otherwise, use the Monroe number.

If the Toledo line is busy, call on the Monroe line.

DRIVER INSTRUCTIONS

ACCIDENTAL SPILLS: NOTIFICATION

Be prepared to give the following information. Use your manifests for parts of this information. Also, have your pad and pen handy in case you have to write down instructions from S-I-S, the Police, etc. Use this page if necessary.

1. The nature of the spill (truck accident, leaking tanker, leaking drum, drum fell off truck, etc.).
2. Persons injured?
3. Property damage?
4. Fire?
5. Material spilled (from the manifests).
6. Volume of the spill.
7. Flammable? Corrosive? Toxic? (from the manifests)
8. Has the material gone into a creek, lake, pond, etc.?
9. Name of the carrier? Other identification?

Salco Industrial Services
704 Conant Street, Monroe, Michigan
(313) 243-2820
EPA Identification Number MID000722728
DNR Permit Number H-366

NOTICE

You, as the driver, should be aware that Salco Industrial Services can clean up its own spills.

You should notify the local authority who may be at the scene of your spill. Often these authorities will want to call in an outside spill clean-up company. This can cost a FORTUNE.

So BE SURE AND NOTIFY the authority at the spill scene that S-I-S is prepared to handle its own spill. And if other arrangements must be made, they will be made by the S-I-S office.

If there are any questions about this from the authorities at the spill scene, give them Salco's number

Monroe (313) 243-2820
Toledo (419) 255-6463
extension

Frank Fulner (313) 243-2820
home phone

DRIVER INSTRUCTIONS

The next four pages are photo copies of the actual Federal Register in which the hazardous waste regulations are published. These are not all of the transporter regulations, of course. These pages just give a brief outline, and one must go to a number of other published regulations to get the total picture (or try to get it). Note that they keep refering you to 40 CFR so-and-so, 49 CFR so-and-so, etc.

We don't expect you to learn what is in these four Federal Register pages. They are just here to give you an idea of what the regulations look like.

However, the DRIVER INSTRUCTIONS which are in this booklet, and which are based on the Federal Register regulations, you are expected and REQUIRED to learn.

Salco

INDUSTRIAL
SERVICES

704 Conant St.
Monroe, Mich. 48161

Phone (313) 243-2820

Toledo (419) 255-6463

RULES FOR MANIFESTS FOR REJECTED LOAD.

FROM DNR !!

"If for any reason a waste shipment cannot be delivered to the disposal facility indicated on the manifest issued by the generator, all of the following provisions shall be complied with:

(a) The hauler shall describe on the manifest the reason for non-delivery and shall leave with, or transmit to, the disposal facility an unsigned copy of the manifest.

(b) The hauler shall return the remaining copies of the manifest to the generator and shall either obtain a new manifest from the generator prepared in accordance with R299.0806 or shall return the entire shipment of waste to the site of generation. If the hauler returns the shipment to the site of generation, it shall be delivered to the generator within 15 calendar days after delivery to the disposal facility was attempted."

WASTE DISPOSAL MANIFEST

☐ Act 64 Waste (HAZARDOUS)☒ Act 136 Waste☐ Other

MI 029418

IDENTIFICATION	Generator's Name Various Service Stations	Primary Transporter's Name Salco Industrial Service	Treatment, Storage or Disposal Facility Salco Industrial Service
	Site Address	Transporter's Address 704 Conant St. Monroe, Mich. 48161	Facility Address 704 Conant St. Monroe, Mich. 48161
	Phone Number ()	Phone Number 313, 243-2820	Phone Number 313, 243-2820
	Generator's Site EPA I.D. Number MIG000099999	Transporter's EPA I.D. Number MID000722728	Facility Site EPA I.D. Number MID000722728

If more than one Transporter is to be utilized, give the Name and EPA I.D. Number of each:

GENERATOR COMPLETES	WASTE INFORMATION	LOT NO.	U.S. D.O.T. Shipping Name (or common name if there is no D.O.T. shipping name).	D.O.T. Hazard Class	U.N./N.A. No.	Haz. Class Code	Container		Form				Total Weight or Volume	Units	Hazardous or Liquid Waste N or
							No.	Type	Solid	Liquid	Gas	Sludge			
		1.	Waste Oil/Water (crankcase)	Non-Hazardous		I	1	CT.	X				50	GAL.	011711
		2.				I									
		3.				I									
		4.				I									
		5.				I									
		6.				I									

Include Safety precautions and special handling instructions.

SPILL: Sand or non-combustible absorbent material

GENERATOR CERTIFICATION: I certify that the above named materials are properly classified, described, packaged, marked and labeled and are in proper condition for transportation according to the applicable regulations of the Department of Transportation and U.S. EPA. I further certify that the information contained on the manifest is factual. I understand that the failure to accurately report all information requested by the manifest constitutes a violation of 1979 PA64 and/or 1969 PA136. I further understand that this manifest may be used in administrative and court proceedings.

Generator Signature

Date Shipped
MO. DAY YEAR

HAULER'S CERTIFICATION: I certify acceptance of the above identified wastes for transportation. I further certify that I shall deliver the hazardous wastes, together with this manifest, only to the destination specified by the generator on this manifest. I understand that this manifest can be used in administrative and court proceedings.

Transporter
Vehicle
I.D. No.

No. 1 366-1

Subsequent
Transporter
Vehicle I.D. No's

Transporter Signature

Date(s) Received

①
② Jamie Wood
③

052383

If the shipment cannot be delivered, describe the reasons for non-delivery

TSDF CERTIFICATION: I certify receipt at this facility of the above identified wastes and that this facility is licensed to accept those wastes. I also certify that the wastes were accompanied by a manifest properly certified by both the generator and hauler and that this facility is the destination indicated on the manifest. I understand that this manifest can be used in administrative and court proceedings.

TSDF Signature

① Frank Lelmer
Facility Site EPA I.D. Number
MITD1010101712121218

☒ Accepted
☐ Rejected

Date Received

Describe any significant discrepancies between manifest and shipment.

Was a Surcharge Assessed?

☐ Yes☒ No

052383

STATE OF MICHIGAN
WASTE DISPOSAL MANIFEST

☐ Act 64 Waste (HAZARDOUS)

☒ Act 136 Waste

☐ Other

MI 0294057

IDENTIFICATION	Generator's Name Various Stations	Primary Transporter's Name Salco Industrial Service	Treatment, Storage or Disposal Facility Salco Industrial / Service
	Site Address	Transporters Address 704 Conant St. Monroe, Michigan 48161	Facility Address 704 Conant St. Monroe, Michigan 48161
	Phone Number ()	Phone Number (313) 243-2820	Phone Number (313) 243-2820
	Generator's Site EPA I.D. Number MI0000099999	Transporter's EPA I.D. Number MI0000722728	Facility Site EPA I.D. Number MI0000722728

If more than one Transporter is to be utilized, give the Name and EPA I.D. Number of each:

LOT NO.	U.S. D.O.T. Shipping Name (or common name if there is no D.O.T. shipping name).	D.O.T. Hazard Class	U.N./N.A. No.	Haz. Class Code	Container		Form					Total Weight or Volume	Units	Hazardous or Liquid Waste Num.
					No.	Type	Solid	Liquid	Gas	Sludge				
1.	Waste oil/water	Non-Hazardous			1	CT.		X				535	GAL.	0171
2.														
3.														
4.														
5.														
6.														

COMMENTS	Include Safety precautions and special handling instructions. SPILL; sand or non-combustible absorbent material
----------	---------------------------------------------------------------------------------------------------------------------------

GENERATOR CERTIFICATION: I certify that the above named materials are properly classified, described, packaged, marked and labeled and are in proper condition for transportation according to the applicable regulations of the Department of Transportation and U.S. EPA. I further certify that the information contained on the manifest is factual. I understand that the failure to accurately report all information requested by the manifest constitutes a violation of 1979 PA64 and/or 1969 PA136. I further understand that this manifest may be used in administrative and court proceedings.	Generator Signature ①	Date Shipped MO. DAY YEAR
-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	--------------------------	------------------------------

HAULER'S CERTIFICATION: I certify acceptance of the above identified wastes for transportation. I further certify that I shall deliver the hazardous wastes, together with this manifest, only to the destination specified by the generator on this manifest. I understand that this manifest can be used in administrative and court proceedings.	Transporter Vehicle I.D. No. No. 1 366-1 Subsequent Transporter Vehicle I.D. No.'s	Transporter Signature ② Subsequent transporter(s) signature(s) ③	Date(s) Received
------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	----------------------------------------------------------------------------------------------	---------------------------------------------------------------------------	------------------

If the shipment cannot be delivered, describe the reasons for non-delivery.

TSDF CERTIFICATION: I certify receipt at this facility of the above identified wastes and that this facility is licensed to accept those wastes. I also certify that the wastes were accompanied by a manifest properly certified by both the generator and hauler and that this facility is the destination indicated on the manifest. I understand that this manifest can be used in administrative and court proceedings.	TSDF Signature ④ Facility Site EPA I.D. Number MI0000722728	<input type="checkbox"/> Accepted <input type="checkbox"/> Rejected	Date Received
Describe any significant discrepancies between manifest and shipment.	Was a Surcharge Assessed?	<input type="checkbox"/> Yes <input type="checkbox"/> No	



JAMES J. BLANCHARD, Governor

DEPARTMENT OF NATURAL RESOURCES

STEVENS T. MASON BUILDING
BOX 30028
LANSING, MI 48909
HOWARD A. TANNER, Director

Reply to:
2309 Shelby
Ann Arbor, MI 48103
(313) 665-9461

March 28, 1983

SALCO

704 Conant Street
Monroe, Michigan 48161

Attention: Frank Fulner, Manager

MID 000722728

Dear Mr. Fulner:

As an authorized representative of the U.S. Environmental Protection Agency, I conducted a site investigation of your transport facility on March 22, 1983, to evaluate compliance of this facility with requirements of Subtitle C of the Resource Conservation Recovery Act (RCRA) as amended. Enclosed for your information is the RCRA Inspection Report-Form C-Part 263; Standards Applicable to Transporters of Hazardous Waste which I completed during this investigation.

Thank you for your time and cooperation. If you have any questions or concerns relative to this report, please contact me at (313) 665-9461.

Sincerely,

Laura L. Lodisio,
Resource Specialist
Hazardous Waste Management Division

cc: U.S. EPA, Region V
cc: Al Howard, OHWM, MDNR
Enclosure

LLL:vl

#1501

успешно в этой области

Date of inspection: 03-22-83 Time of inspection (from) 2:00 (to) 4:00

~~SECRETARY~~

RESOURCE SPECIALIST

Inspection Form(s)

- | | | |
|---------------|----------------------------------------------------------------------------------------|--------------|
| II | Treatment/Storage/Disposal per 40 CFR 265.1 and/or
Generation and/or Transportation | A |
| II | Treatment/Storage/Disposal (no generation or Transportation) | A |
| II | Generation and Transportation | B, C |
| II | Generation only | B |
| II | Transportation only | C |

Reproduced by the State of Michigan

Inspection Form C

YES NO NI Remarks

Section A: SCOPE OF INSPECTION

1. Complete this inspection form for transporters of hazardous waste subject to 40 CFR 263.10.
2. Does the transporter transport hazardous waste into the U.S. from abroad?
3. Does the transporter transport hazardous waste out from the U.S.?
4. Does the transporter mix hazardous waste of different DOT shipping descriptions by placing them into a single container.

✓			
	✓		
	✓		
	✓		

Section B: MANIFEST SYSTEM AND RECORDKEEPING (Part 263, Subpart B)

1. Are copies of completed manifests available for review and retained for three years. 263.22
2. Estimate the number of manifests for shipments completed during the part 6 months.
3. Examine a representative number of manifests. Indicate number examined.
4. Did transporter properly sign and date the manifests examined?
5. Do any manifests indicate shipments delivered to other than the designated facility? 263.21
If (5) is "no," skip 6 and 7.
6. Do any manifests indicate shipments delivered to other than an alternate facility?
7. Are shipments delivered to alternate facilities only because emergency prevents delivery to the designated facility?

✓			
			~300-350
		12	
✓			
	✓		

Revised by the EPA Administrator

STATE IDENTIFICATION NUMBER
(If Applicable)

EPA

MID 000722 728
EPA IDENTIFICATION NUMBER
263.11(a) 422

RCRA INSPECTION REPORT - INTERIM STATUS STANDARDS
Form C - Transporter Inspection
(40 CFR Part 263)

I. General Information:*

(A) Transporter Name: Cousins Industrial Services
(B) Street: 704 Conant
(C) City: Monroe (D) State: Mich (E) Zip Code: 48161
(F) Phone: 313-243-2820 (G) County: Monroe
(H) Date of Inspection: 4/15/82 Time of Inspection (From) 2:20P (To) 2:45P
(I) Weather Conditions: Sunny; warm

(J) Person(s) Interviewed	Title	Telephone
<u>Barry Cousins</u>	<u>Pres</u>	<u>see F</u>
_____	_____	_____
_____	_____	_____

(K) Inspection Participants	Agency/Title	Telephone
<u>Daniel Schultz</u>	<u>DNR / Water Qual Spec</u>	<u>517 373 2794</u>
_____	_____	_____
_____	_____	_____

(L) Preparer Information	Agency/Title	Telephone
Name: <u>Daniel Schultz</u>	<u>see K</u>	<u>K</u>

*If site is also a generator do not complete section I of this form.

Do not use this form if transporter is also a treatment, storage, and/or disposal facility.
Complete form "A" if the transporter is also a TSD facility.

II. OTHER TYPES OF HAZARDOUS WASTE ACTIVITY

(A) N/A Treatment, Storage, and/or Disposal

(B) N/A Generator (Form B)

(If site is also a generator or TSD, attach this form to form "A" or "B" as appropriate.)

Briefly describe site activity: _____

III. MANIFEST SYSTEM AND RECORDKEEPING (Subpart B)

	Yes	No	NI*	Remarks
(A) Are Copies of the Completed Manifests or Shipping Paper(s) Available for Review and Retained for Three Years?	<u>✓</u>	_____	_____	_____
263.22(a)				

IV. INTERNATIONAL SHIPMENTS

	Yes	No	NI*	Remark Number
A. Does the Transporter Record on the Manifest the Date the Waste left the U.S?	_____	_____	_____	<u>N/A</u>
263.20(f)1				
B. Are Signed Completed Manifest(s) on File?	_____	_____	_____	<u>N/A</u>
263.22(a) and 263.20(f)2				

*Not Inspected

Rev. 1-26-81

V. MISCELLANEOUS

- A. Does Transporter Transport
Hazardous Waste into the
U.S. from Abroad

263.10(c)1

N/A

- B. Does the Transporter Mix
Hazardous Waste of Different
DOT Shipping Descriptions
by Placing them into a Single
Container?

263.10(c)2

N/A

NOTE: If (A) or (B) were answered "Yes" then the Transporter is also a Generator and Must
comply with the Generator Regulations.

263.10(c)

VI. REMARKS

Remarks: _____

D. Corrective Action

MICHIGAN DEPARTMENT OF NATURAL RESOURCES

INTEROFFICE COMMUNICATION

October 31, 1989

TO: Larry AuBuchon, Detroit District, WMD

FROM: *Nadine Romero*
Nadine Romero, Geotech Unit, WMD

SUBJECT: Salco Review Comments
MID 000 722 728

I have reviewed the Salco Site Investigation Workplan submitted September 28, 1989. The following items should be addressed before the workplan is carried out:

1. Although, the intent of this investigation is to identify the surface of the clay cap on site and the thickness of the fill, appropriate safety precautions should be taken during drilling and sampling. The consultants should assume they are drilling through a landfill.
2. The facility should establish a grid using the formulas provided in the 'How Clean is Clean' guidance document. It is not clear from the workplan how many samples will be taken horizontally across the site.
3. During the field screening of soils using the PID, field analysis should be conducted immediately following the sample collection. This was not indicated in the workplan.
4. Recent research has shown that holding samples in a jar covered with foil and then piercing the foil with the tip of the PID, affects the integrity of the sample reading. Headspace screening should be done with a leak-tight container such as a polyethylene bag as recommended in Ground Water Monitoring Review, Fall 1989 issue, "A Field Screening Method for Gasoline Contamination Using a Polyethylene Bag Sampling System" by G. Robbins, R. Bristol and V. Roe, page 87.

5. Some of the borings should also be sampled and analyzed for metals, to acquire additional data on the extent of metals contamination in the fill. Section 3.3 on the selection of samples for analyses states that, "soil containing elevated levels of volatile organics (if found) may directly influence the metal contaminant levels in the soil". It is not clear what is meant by this statement. Some of the samples chosen for TPHC analysis should also be run for metals, to see if there is a correlation between possible petroleum contamination with the metals contamination.

This concludes my review of the workplan. If there are any questions or clarification needed the consultants may feel free to contact me (517-373-3711).

cc: Steve Sliver
De Montgomery
Marilyn Sabadaszka, EPA Region V
Geotech File
C&E File

STATE OF MICHIGAN



S.E. Michigan Field Office
15500 Sheldon Road
Northville, MI 48167

NATURAL RESOURCES COMMISSION

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DEPARTMENT OF NATURAL RESOURCES

RONALD O. SKOOG, Director

June 28, 1985

Mr. Frank Fulner, Manager
Salco Industrial Services
704 Conant Street
Monroe, MI 48161

RE: MID 000722728

Dear Mr. Fulner:

This letter is to acknowledge a site visit to your facility on June 24, 1985 and also a telephone conversation on June 26, 1985, with Mary Gillespie. During the site visit, I reviewed the Act 245 violations cited in my May 22, 1985 letter. Your June 6, 1985, letter also addressed the remedial measures you took to correct these violations. With the exception of the clean-up of the containment area and some surrounding contaminated soils, the noted violations have been rectified.

Mary Gillespie indicated that Toledo Testing will be starting the closure of your hazardous waste storage area on July 8, 1985, in accordance with your approved closure plan. This update was in response to another May 22, 1985, letter addressing RCRA deficiencies.

You are requested to complete the clean-up of the containment area and remaining contaminated soils by July 10, 1985. Additionally, you are requested to keep me informed relating to the progress of your closure.

If you have any questions, please feel free to contact me at (313) 459-9180.

Sincerely,

A handwritten signature in cursive script that reads "Larry AuBuchon".

Larry AuBuchon
HAZARDOUS WASTE DIVISION

LA:jg

cc: U.S. EPA, Region V
B. Okwumabua

CERTIFICATION REGARDING POTENTIAL RELEASES FROM
SOLID WASTE MANAGEMENT UNITS

NOV 26 1985

FACILITY NAME: Salco Industrial Services
EPA I.D. NUMBER: MID 000 722 728
LOCATION CITY: Monroe (704 Conant St.)
STATE: Michigan 48161

1. Are there any of the following solid waste management units (existing or closed) at your facility? NOTE - DO NOT INCLUDE HAZARDOUS WASTE UNITS CURRENTLY SHOWN IN YOUR PART A APPLICATION

	YES	NO
• Landfill	_____	<u>X</u>
• Surface Impoundment	_____	<u>X</u>
• Land Farm	_____	<u>X</u>
• Waste Pile	_____	<u>X</u>
• Incinerator	_____	<u>X</u>
• Storage Tank (Above Ground)	_____	<u>X</u>
• Storage Tank (Underground)	_____	<u>X</u>
• Container Storage Area	_____	<u>X</u>
• Injection Wells	_____	<u>X</u>
• Wastewater Treatment Units	_____	<u>X</u>
• Transfer Stations	_____	<u>X</u>
• Waste Recycling Operations	_____	<u>X</u>
• Waste Treatment, Detoxification	_____	<u>X</u>
• Other <u>NO</u>	_____	_____

RECEIVED
DEC 17 1985
SOLID WASTE BRANCH
U.S. EPA, REGION V

2. If there are "Yes" answers to any of the items in Number 1 above, please provide a description of the wastes that were stored, treated or disposed of in each unit. In particular, please focus on whether or not the wastes would be considered as hazardous wastes or hazardous constituents under RCRA. Also include any available data on quantities or volume of wastes disposed of and the dates of disposal. Please also provide a description of each unit and include capacity, dimensions and location at facility. Provide a site plan if available.

N/A

NOTE: Hazardous wastes are those identified in 40 CFR 261. Hazardous constituents are those listed in Appendix VIII of 40 CFR Part 261.

3. For the units noted in Number 1 above and also those hazardous waste units in your Part A application, please describe for each unit any data available on any prior or current releases of hazardous wastes or constituents to the environment that may have occurred in the past or may still be occurring.

Please provide the following information

- a. Date of release
- b. Type of waste released
- c. Quantity or volume of waste released
- d. Describe nature of release (i.e., spill, overflow, ruptured pipe or tank, etc.)

N/A

4. In regard to the prior or continuing releases described in Number 3 above, please provide (for each unit) any analytical data that may be available which would describe the nature and extent of environmental contamination that exists as a result of such releases. Please focus on concentrations of hazardous wastes or constituents present in contaminated soil or groundwater.

N/A

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the submittal is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations. (42 U.S.C. 6902 et seq. and 40 CFR 270.11(d))

Richard A. Keyes President
Typed Name and Title

Richard A. Keyes
Signature

12-11-85
Date

CONTINUING RELEASES AT PERMITTED FACILITIES

Sec. 206. Section 3004 of the Solid Waste Disposal Act is amended by adding the following new subsection after subsection (t) thereof:

"(u) CONTINUING RELEASES AT PERMITTED FACILITIES.—Standards promulgated under this section shall require, and a permit issued after the date of enactment of the Hazardous and Solid Waste Amendments of 1984 by the Administrator or a State shall require, corrective action for all releases of hazardous waste or constituents from any solid waste management unit at a treatment, storage, or disposal facility seeking a permit under this subtitle, regardless of the time at which waste was placed in such unit. Permits issued under section 3005 shall contain schedules of compliance for such corrective action (where such corrective action cannot be completed prior to issuance of the permit) and assurances of financial responsibility for completing such corrective action."